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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Appellate Case No. 2019-000995

RECEIVED
JUL 03 2019
SC Court of Appeals

Amber Geohaghan

Appellant

v.

South Carolina Department of Employment and Workforce and
South Carolina Department of Social Services,

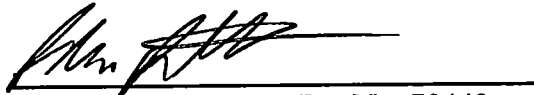
Respondents

MOTION FOR EXTENSION OF TIME

Appellant hereby moves, pursuant to Rule 236(b), SCACR, for a 60-day extension of time to file her initial brief. This is Appellant's first request for an extension of time. The issues presented in this case include questions surrounding the appropriate standard of review on appeal where the South Carolina Department of Employment and Workforce has determined that an employee voluntarily left employment without good cause and, as a result, is disqualified from receiving unemployment benefits. These issues are not well-settled in South Carolina and their resolution may affect a multitude of cases in the future. Given the importance and complexity of the issues presented, Appellant submits that the requested extension is warranted.

THEREFORE, Appellant respectfully requests that a 60-day extension of time to file her initial brief be granted and that her initial brief be due on or before September 16, 2019

July 2, 2019



Adam Protheroe, S.C. Bar No. 78442
SC Appleseed Legal Justice Center
P.O. Box 7187
Columbia, SC 29202
(803) 779-1113
Attorney for Appellant

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Case No. 18-ALJ-22-0351-AP

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Respondents

CERTIFICATE OF SERVICE

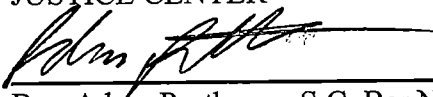
I certify that I have served the Motion for Extension of Time on Respondents by depositing a copy of it in the United States Mail, postage prepaid, on the date below addressed to their attorneys of record:

Benjamin T. Cook
Todd Timmons
S.C.D.E.W.
P.O. Box 8597
Columbia, SC 29202

Anthony S.H. Catone
Office of General Counsel
S.C. Dep't of Social Services
P.O. Box 1520
Columbia, SC 29202-1520

SOUTH CAROLINA APPLESEED LEGAL
JUSTICE CENTER

July 2, 2019


By: Adam Protheroe, S.C. Bar No. 78442
P.O. Box 7187
Columbia, SC 29202
(803) 779-1113 ext. 106

July 2, 2019

Via First Class Mail

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

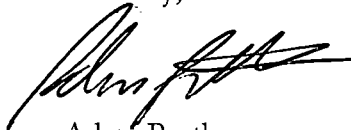
**RE: Amber Geohaghan v. SC Dept. of Soc. Serv. and S.C.D.E.W.
Appellate Case No. 2019-000995**

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Appellant's Motion for Extension of Time along with a check for the \$50.00 filing fee. Please file the original and return one clocked copy to me in the enclosed envelope. By copy of this letter I am serving this motion upon the parties or counsel listed below.

With kind regards, I am

Sincerely,


Adam Protheroe
Attorney for Appellant

RECEIVED

JUL 03 2019

SC Court of Appeals

AP/

CC:

Benjamin T. Cook, Esquire
Todd Timmons, Esquire
S.C. Department of Employment and Workforce
P.O. Box 8597
Columbia, SC 29202

Anthony S. H. Catone, Esquire
South Carolina Department of Social Services
P.O. Box 1520
Columbia, SC 29202-1520



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SOUTH CAROLINA
appleseed
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P.O. BOX 7187
COLUMBIA, SC 29202

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