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**THE STATE OF SOUTH CAROLINA**

**In the Court of Appeals**

**RECEIVED**

AUG 19 2019

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Honorable DeAndrea G. Benjamin, Circuit Court Judge

Case No: 2019-000088

Edward L. Green.....Appellant

v.

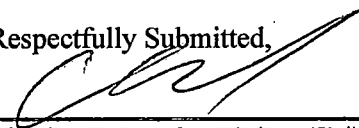
Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South  
Carolina .....Respondent

**MOTION TO REQUEST EXTENSION**

The above-named Appellant, by and through his undersigned counsel, does hereby respectfully moves this Court to hereby request a 30-day extension of time to file the Record on Appeal. This request is made as a result that the Appellant's Counsel is presently experiencing several upcoming trials which require Counsel's immediate attention and the additional time will give Counsel the ability to appropriately prepare the required documentation. This request is made with the consent of opposing counsel for SLED and for The State.

For the reason set forth herein, counsel for the Appellant submits that good cause has been shown why the time limits prescribed by the Rules should be changed and the Appellant be given an additional thirty (30) day period with which to file the Record on Appeal.

Respectfully Submitted,



Charles T. Brooks, III /Bar ID#11762  
309 Broad Street  
Post Office Box 3512  
Sumter, SC 29151  
(803) 418-5708

Sumter, SC  
August 16, 2019

**PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
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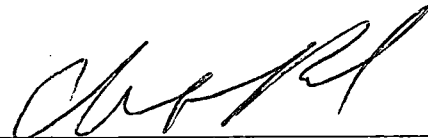
Mark Keel, Director South  
Carolina Law Enforcement  
Division (SLED) and the State  
of South Carolina,

Respondent.

**PROOF OF SERVICE**

I certify that I have served the Motion for Extension to File the Record on Appeal, on Mark Keel, Director South Carolina Law Enforcement Division (SLED) by depositing a copy of it in the United States Mail, postage prepaid, on August 16, 2019, addressed to their attorneys of record, Adam L. Whitsett, Post Office Box 21398, Columbia, South Carolina 29221 and that I have served The State of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on August 16, 2019, addressed to their attorneys of record, Harley Kirkland, Post Office Box 11549, Columbia, South Carolina 29211.

August 16, 2019



Charles T. Brooks, III  
Post Office Box 3512  
Sumter, South Carolina 29151  
(803) 418-5708  
Attorney for Appellant

# The Brooks Law Office, LLC

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**CHARLES T. BROOKS, III, ATTORNEY AT LAW**

**IRMA R. BROOKS, ATTORNEY AT LAW**

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August 16, 2019

South Carolina Court of Appeals  
Jenny Abbott Kitchings  
Post Office Box 11629  
Columbia, South Carolina 29211

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AUG 19 2019  
SC Court of Appeals

RE: Green vs. Mark Keel, Chief of the South Carolina Law Enforcement Division, et al  
Appellate Case No.: 2018-000088

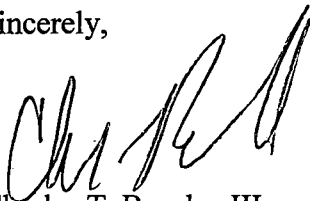
Dear Ms. Kitchings:

Please find enclosed herewith the Appellant's Motion to Request Extension with reference to the above case. I have also provided the necessary copies and filing fees for this Motion. Please return the filed copy(ies) to my attention in the provided return envelope.

If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,



Charles T. Brooks, III

CTB,III/jlm

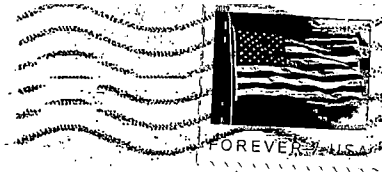
Enclosed as stated

cc: Adam Whitsett, SLED  
Harley Kirkland, SCAG Office

CHARLES T. BROOKS, III  
THE BROOKS LAW OFFICES, LLC  
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COLUMBIA, SC 290

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**SC Court of Appeals**

South Carolina Court of Appeals  
ATTN: Clerk  
Post Office Box 11629  
Columbia, South Carolina 29211

29211-162929

