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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

Amber Geohaghan

v.

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

Respondents

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OCT 23 2019
Appellant
SC Court of Appeals

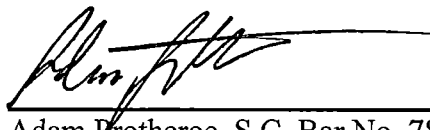
MOTION FOR EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF

Appellant hereby moves, pursuant to Rule 263(b), SCACR, for an extension of time to file her initial reply brief until November 25, 2019. On October 16, 2019, respondent South Carolina Department of Social Services ("SCDSS") filed and served its initial brief in this matter. On the same day, respondent South Carolina Department of Employment and Workforce ("SCDEW") moved for a thirty-day extension to file its initial brief. By Order filed October 21, 2019, this Court granted SCDEW's motion and extended the time for SCDEW to file its initial brief until November 15, 2019. As a result, Appellant's initial reply to SCDSS' brief would be due on October 28, 2019 and a separate reply to SCDEW's brief would be due on November 25, 2019. In order to prevent duplication of effort and to consolidate

Appellant's reply into a single brief, Appellant requests that she be allowed to file and serve a single initial reply to respondents SCDSS and SCDEW by November 25, 2019 and that all deadlines in this case be suspended pending action on this motion. Appellant submits that granting this request would not result in prejudice to any party and would not result in undue delay.

Respectfully Submitted,

October 23, 2019



Adam Frotheroe, S.C. Bar No. 78442
SC Appleseed Legal Justice Center
P.O. Box 7187
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Attorney for Appellant

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CERTIFICATE OF SERVICE

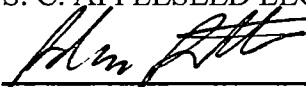
I certify that I have served the **MOTION FOR EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF** on Respondents by depositing a copy of it in the United States Mail, postage prepaid, on the date below addressed to their attorneys of record:

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

Eugene H. Matthews, Esquire
Richardson Plowden & Robinson, P.A.
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S. C. APPLESEED LEGAL JUSTICE CENTER

October 23, 2019


By: Adam Protheroe, S.C. Bar No. 78442
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(803) 779-1113 ext. 106

October 23, 2019

Via Hand Delivery

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

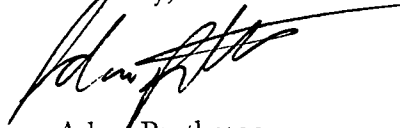
**RE: Amber Geohaghan v. SC Dept. of Soc. Serv. and S.C.D.E.W.
Appellate Case No. 2019-000995**

Dear Ms. Kitchings:

Please find enclosed the original and six copies of Appellant's motion for extension of time to file initial reply brief. Please file the original and return one clocked copy to me. By copy of this letter I am serving these documents upon the parties or counsel listed below.

With kind regards, I am

Sincerely,



Adam Protheroe
Attorney for Appellant

AP/

CC:

Benjamin T. Cook, Esquire
Todd Timmons, Esquire
S.C. Department of Employment and Workforce
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