

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah Brooks Durden, Administrative Law Judge

Appellate Case No. 2019-001033

Cortez M. Jiles,

Respondent,

v.

South Carolina Department of Employment and House of Raeford  
Farms, Inc.

Of Which South Carolina Department of Employment and  
Workforce is the Appellant.

**SECOND MOTION TO ENLARGE TIME FOR FILING OF THE RESPONDENT'S  
INITIAL BRIEF AND DESIGNATION OF MATTER**

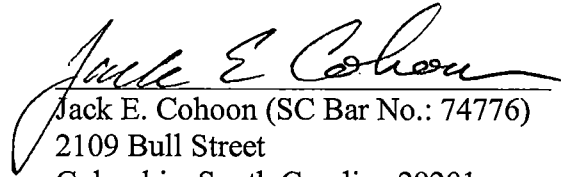
Respondent Cortez M. Jiles' initial brief and designation of matter to be included in the record on appeal are due to be served and filed on October 23, 2019. Respondent's counsel's time to prepare these filings has been limited because of staff changes at his firm and the resulting need to cover other attorneys' caseloads. Respondent's counsel respectfully requests a thirty-day extension of time for the deadline to file the above-referenced documents. This is Respondent's second request for an extension of time in this case, and Respondent does not anticipate the need for any additional extensions. This motion is made in good faith, is not for the purpose of delay, and is necessary to properly complete the serving and filing of these documents.

The requested extension would change the due date of Respondent's brief and designation of matter from October 23, 2019 to December 22, 2019.

**RECEIVED**  
OCT 23 2019  
SC Court of Appeals

Respectfully Submitted,

SOUTH CAROLINA LEGAL SERVICES

A handwritten signature in black ink, reading "Jack E. Cohoon". The signature is written in a cursive style with a large, sweeping initial "J".

Jack E. Cohoon (SC Bar No.: 74776)

2109 Bull Street

Columbia, South Carolina 29201

Office: (803) 744-4166

Fax: (803) 799-1781

Attorney for Respondent Cortez M. Jiles

October 23, 2019

Columbia, S.C.

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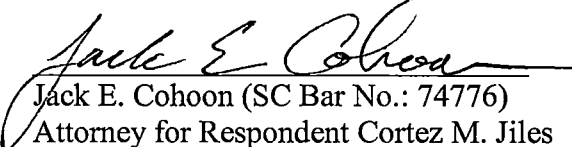
Of Which South Carolina Department of Employment and  
Workforce is the Appellant.

**PROOF OF SERVICE**

I certify that I have served the *Second Motion to Enlarge Time for Filing of the Respondent's Initial Brief and Designation of Matter* on the parties in this case by depositing a copy of it in the United States Mail, postage prepaid, on September 23, 2019, addressed to the parties at their addresses of record:

Benjamin T. Cook, Esq.  
Paul Famolari, Esq.  
Office of General Counsel  
S.C. Dept. of Empl. and Workforce  
P.O. Box 8597  
Columbia, SC 29202

House of Raeford Farms  
P.O. Box 21456  
Columbia, SC 29221

  
Jack E. Cohoon (SC Bar No.: 74776)  
Attorney for Respondent Cortez M. Jiles

October 23, 2019

Columbia, S.C.

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Legal Services**

Balancing the Scales of Justice

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[www.slegal.org](http://www.slegal.org) | [www.lawhelp.org/sc](http://www.lawhelp.org/sc) | [www.probono.net/sc](http://www.probono.net/sc)

October 23, 2019

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

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OCT 23 2019  
SC Court of Appeals

BY HAND-DELIVERY

Re: Cortez M. Jiles v. S.C. Dept. of Employment and Workforce and House of Raeford Farms  
Appellate Case No.: 2019-001033  
Our File No.: 18-0664287

Dear Ms. Kitchings:

Enclosed please find an original and six copies of the Respondent's *Second Motion to Enlarge Time for Filing of the Respondent's Initial Brief and Designation of Matter* in the above-referenced case.

Please do not hesitate to call me at (803) 744-4166 if you have any questions.

Sincerely,

Jack E. Cohoon  
Head Attorney, Employment Unit

Enclosures

Cc: Paul Famolari, Esq.  
Benjamin Cook, Esq.  
House of Raeford Farms

