

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal From The Administrative Law Court

The Honorable Ralph K. Anderson, III, Chief Administrative Law Judge

Appellate Case No. 2019-001554

RECEIVED
NOV 01 2019
SC Court of Appeals
Appellant,

STEWART BUCHANAN,

v.

SOUTH CAROLINA DEPARTMENT OF
PROBATION, PAROLE AND PARDON SERVICES

Respondent.

SECOND MOTION FOR EXTENSION OF TIME

Appellant, Stewart Buchanan, through undersigned counsel, respectfully requests the Court grant an extension of time in which to serve and file Appellant's Initial Brief, currently due to be filed on November 12, 2019. Specifically, undersigned counsel requests an additional thirty (30) days in which to file the Initial Brief. In support of this motion, undersigned counsel would show:

(1) This Court granted Appellant's first extension request, extending the deadline to file and serve the Initial Brief until November 12, 2019.

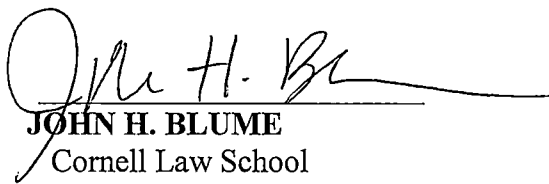
(2) Undersigned counsel has consulted with counsel for Respondent who consents to the above requested thirty (30) day extension of time.

(3) Undersigned counsel John Blume, who is representing Mr. Buchanan *pro bono*, is a full-time Professor at Cornell Law School in Ithaca, New York and the current deadline falls in a

particularly busy time in the academic year. He also has other *pro bono* clients with filing deadlines in the next month, including a capital post-conviction appeal.

(1) For the above reasons, which counsel believes constitute good cause under this Court's Order Dated March 18, 2009, undersigned counsel requests that this Court extend the deadline for filing Appellant's Initial Brief in this case an additional thirty (30) days.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John H. Blume", with a long horizontal flourish extending to the right.

JOHN H. BLUME
Cornell Law School
159 Hughes Hall
Ithaca, NY 14853-4901
(607) 205-1030

October 31, 2019

STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM
THE ADMINISTRATIVE LAW COURT
The Honorable Ralph K. Anderson, III, Chief Administrative Law Judge

ALC Docket No. 18-ALJ-15-0039

STEWART BUCHANAN,

Appellant,

v.

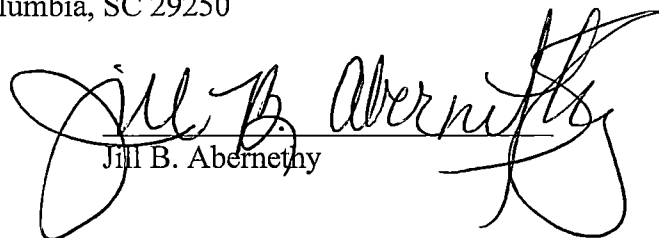
SOUTH CAROLINA DEPARTMENT OF
PROBATION, PAROLE AND PARDON SERVICES

Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Appellant's Second Motion for Extension of Time was served by first class United States mail, postage prepaid, this 31st day of October, 2019, upon the following:

Tommy Evans, Jr.
Department of Probation, Parole and Pardon Services
P.O. Box 50666
Columbia, SC 29250


Jill B. Abernethy

October 31, 2019

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SC Court of Appeals

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

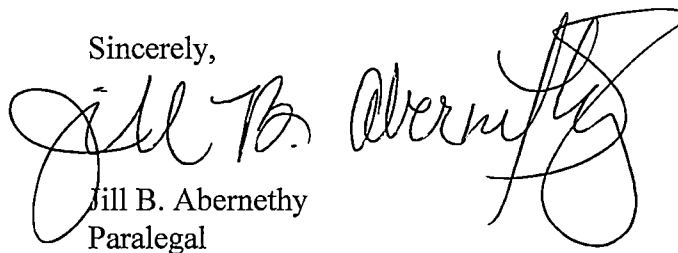
RE: *Stewart Buchanan, SCDC#69848 v. SC Department of Probation, Parole,
& Pardon Services*

Dear Ms. Kitchings:

Please find enclosed for filing, along with certificate of service, the original and seven copies each of Appellant's Second Motion for Extension of Time in regards to the above captioned case. Please clock-in the extra copy and return it to me in the enclosed self-addressed stamped envelope.

If you should have any questions, please feel free to contact our office.

Sincerely,


Jill B. Abernethy
Paralegal

Enclosure

cc: Tommy Evans, Esq.
Stewart Buchanan



FOREVER / USA



FOREVER - USA



FOREVER / USA

JUSTICE (360) ADVANCING EQUALITY IN THE
CRIMINAL JUSTICE SYSTEM

300 BLENWOOD AVENUE
SUITE 200
COLUMBIA, SC 29202

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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Columbia, SC 29211

