

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

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

Appellate Case No. 2019-000995

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SC Court of Appeals

Amber Geohaghan

Appellant

v.

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

Respondents

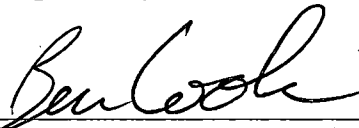
MOTION FOR EXTENSION OF TIME

Respondent hereby moves, pursuant to Rule 263(b), SCACR, for a 30-day extension of time to file its initial brief and designation of matter. This is Respondent's second request for an extension of time. The Department requests additional time due to an abnormally high workload for the Department's counsel over the last month. The Department respectfully requests the Court enter an order granting an additional thirty days to file its brief and designation of matter as good cause exists and the additional time requested will

not prejudice either party or cause undue delay. Respondent also requests the Court hold all timelines and due dates in abeyance pending the outcome of this motion.

Respondent also notes the Court previously granted an extension of time for the filing of Appellant's Reply Brief in this matter and would request the Court grant a corresponding extension of thirty days for the Appellant to file her Reply Brief in this matter in order to avoid duplication of effort.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ben Cook", written over a horizontal line.

Benjamin T. Cook (Bar # 102216)
Post Office Box 8597
Columbia, SC 29202
(803) 737-0395

November 15, 2019

Attorney for Respondent
SC Dept. of Employment and Workforce

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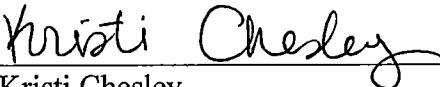
PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time of Respondent South Carolina Department of Employment and Workforce on the parties in this case by depositing a copy of it in the United States Mail, postage prepaid, on November 15, 2019, addressed to the parties at their addresses of record:

Adam Protheroe
PO Box 7187
Columbia SC 29202

SC Dept of Social Services
Attn: Office of General Counsel
PO Box 1520
Columbia SC 29202

November 15, 2019



Kristi Chesley
Administrative Legal Assistant
South Carolina Department of Employment and
Workforce
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Henry McMaster
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Telephone: (803) 737-2666
Fax: (803) 737-0124

November 15, 2019

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

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RE: Amber Geohaghan v. South Carolina Department of
Employment and Workforce and South Carolina Department of
Social Services
Appellate Case No: 2019-000995

Dear Ms. Kitchings:

Enclosed are the original and six copies of a Motion for Extension of Time of Respondent South Carolina Department of Employment and Workforce. A Proof of Service is also included in this packet.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Kristi Chesley".

Kristi Chesley
Administrative Legal Assistant for
Benjamin Cook
Attorney for Respondent South Carolina
Department of Employment and Workforce

SOUTH CAROLINA
DEPARTMENT OF EMPLOYMENT AND WORKFORCE
P.O. BOX 995
COLUMBIA, S.C., 29202

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Post Office Box 11629
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