

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

STEWART BUCHANAN,

v.

SOUTH CAROLINA DEPARTMENT OF
PROBATION, PAROLE AND PARDON SERVICES

Respondent.

THIRD MOTION FOR EXTENSION OF TIME

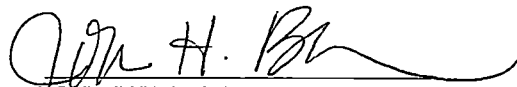
Appellant, Stewart Buchanan, through undersigned counsel, respectfully requests the Court grant an extension of time in which to serve and file Appellant's Initial Brief, currently due to be filed on December 12, 2019. Specifically, undersigned counsel requests an additional thirty days in which to file 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. The Court also granted Appellant's second extension request, extending the deadline to file and serve the Initial Brief until December 12, 2019.
- (2) Undersigned counsel has consulted with counsel for Respondent who consents to the above requested thirty-day extension of time.

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Appellant,

- (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. Co-counsel Hannah Freedman, Mr. Buchanan's other *pro bono* counsel, has a hearing in a capital post-conviction case scheduled for December 13, 2019, and she has another *pro bono* client with filing deadlines this month.
- (4) 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,



JOHN H. BLUME

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

December 10, 2019

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

STEWART BUCHANAN,

v.

SOUTH CAROLINA DEPARTMENT OF
PROBATION, PAROLE AND PARDON SERVICES

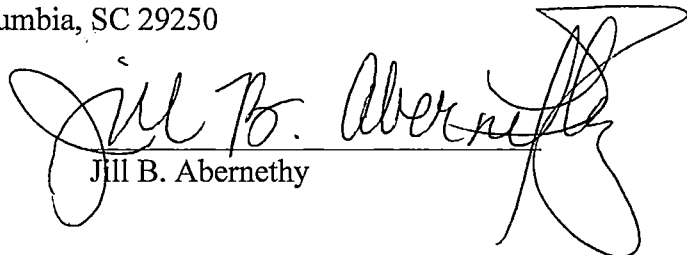
Respondent.

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Appellate

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Appellant's Third Motion for Extension of Time was served by first class United States mail, postage prepaid, this 10th day of December, 2019, upon the following:

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


Jill B. Abernethy

LAW OFFICE OF JOHN BLUME

KEIR M. WEYBLE *OF COUNSEL*
DAVID I. BRUCK *OF COUNSEL*

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December 10, 2019

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

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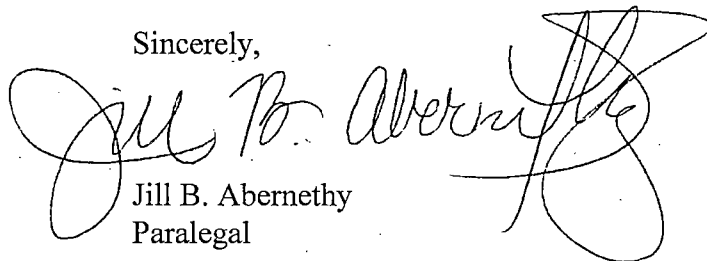
RE: *Stewart Buchanan, SCDC#69848 v. SC Department of Probation, Parole,
& Pardon Services*

Dear Ms. Kitchings:

Please find enclosed for filing, along with certificate of service, the original and seven copies each of Appellant's Third 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.

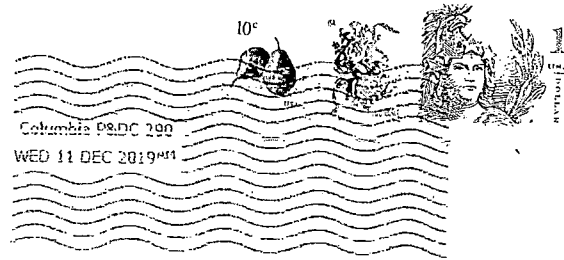
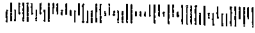
If you should have any questions, please feel free to contact our office.

Sincerely,


Jill B. Abernethy
Paralegal

Enclosure

cc: Tommy Evans, Esq.
Stewart Buchanan



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COLUMBIA, SOUTH CAROLINA 29201

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