

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

MAR 18 2020

SC Court of Appeals

STEWART BUCHANAN,

Appellant,

v.

SOUTH CAROLINA DEPARTMENT OF
PROBATION, PAROLE AND PARDON SERVICES

Respondent.

SECOND MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Appellant, Stewart Buchanan, through undersigned counsel, respectfully requests the Court grant an extension of time in which to serve and file Appellant's Reply Brief, currently due to be filed on March 19, 2020. Specifically, undersigned counsel requests an additional seven days in which to file the Reply 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 Reply Brief until March 19, 2019.
- (2) Undersigned counsel has consulted with counsel for Respondent who consents to the above requested fourteen-day extension of time.
- (3) Undersigned counsel John Blume is representing Mr. Buchanan *pro bono*. He suffered a detached retina on March 12, 2020, and is medically required to refrain from extensive reading and computer use for at least the next seven days.

- (4) For the above reason, which counsel believes constitutes good cause, undersigned counsel requests that this Court extend the deadline for filing Appellant's Reply Brief in this case an additional seven days.

Respectfully submitted,

Hannah Freedman

Hannah Freedman

Megan Barnes

Justice 360

900 Elmwood Ave., Suite 200

Columbia, SC 29201

(803) 765-1044

John H. Blume

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March 17, 2020

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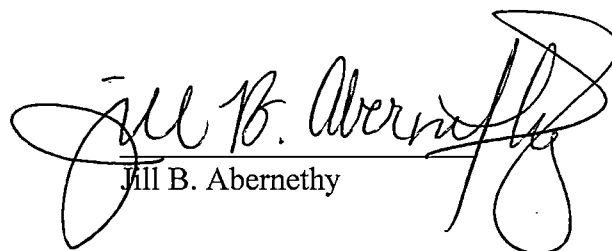
SOUTH CAROLINA DEPARTMENT OF
PROBATION, PAROLE AND PARDON SERVICES

Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Appellant's Second Motion for Extension of Time was served by first class United States mail, postage prepaid, this 17th day of March, 2020 upon the following:

Matthew Buchanan, Esq.
Department of Probation, Parole and Pardon Services
P.O. Box 50666
Columbia, SC 29250


Jill B. Abernethy

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MAR 18 2020

SC Court of Appeals

March 17, 2020

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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

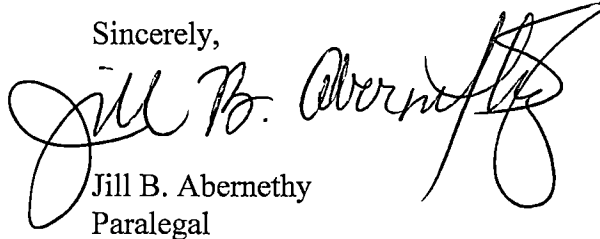
RE: *Stewart Buchanan, SCDC#69848 v. SC Department of Probation, Parole,
& Pardon Services*
Appellate Case No. 2019-001554

Dear Ms. Kitchings:

Please find enclosed for filing, along with certificate of service, the original and one copy each of Appellant's Second Motion for Extension of Time to File Reply Brief 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.

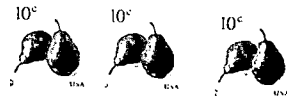
Sincerely,



Jill B. Abernethy
Paralegal

Enclosure

cc: Matthew Buchanan, Esq
Stewart Buchanan



JUSTICE (360) ADVANCING EQUALITY IN THE
CRIMINAL JUSTICE SYSTEM

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COLUMBIA, SC 29201

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