

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM THE SOUTH CAROLINA ADMINISTRATIVE LAW COURT

Deborah Brooks Durden, Administrative Law Judge

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Appellate Case No. 2019-001490  
Lower Court Case No. 2012-ALJ-04-0143-AP

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**RECEIVED**

**Apr 13 2020**

**S.C. SUPREME COURT**

Thomas J. Torrence, #094651 ..... Respondent,

v.

South Carolina Department of Corrections ..... Petitioner.

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**MOTION FOR A 30-DAY EXTENSION OF THE DEADLINE BY WHICH  
THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS  
MAY FILE ITS BRIEF IN SUPPORT OF ITS  
PETITION FOR WRIT OF CERTIORARI**

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By an order dated March 12, 2020, this Court granted the petition for writ of certiorari filed by the Petitioner, the South Carolina Department of Corrections [“SCDC”].

Consequentially, SCDC’s brief in support of its petition for writ of certiorari is due, under South Carolina Appellate Court Rule [“SCACR”] 242(i), no later than today, April 13, 2020.

However, SCDC’s undersigned counsel respectfully moves this Court, under the circumstances described below, for a 30-day extension of the April 13, 2020 deadline associated with SCDC’s brief in support of its petition for writ of certiorari.

Specifically, SCDC’s undersigned counsel respectfully moves this Court to extend the deadline from Monday, April 13, 2020 to Wednesday, May 13, 2020.

SCDC's undersigned counsel so moves given deadlines and obligations he has confronted in other cases pending in both circuit court and federal court since March 12, 2020.

SCDC's undersigned counsel also so moves in reliance upon Section (l)(1), entitled "Extensions of Time," from the order issued March 20, 2020 by this Court and styled as "Operation of the Appellate Courts During the Coronavirus Emergency," Appellate Case No. 2020-000447.

SCDC's undersigned counsel respectfully asserts that the 30-day extension he seeks will not prejudice or otherwise detrimentally impact the rights of the self-represented Respondent.

SCDC's undersigned counsel is serving copies of both his instant motion and this Court's March 20, 2020 order via United States Mail upon the self-represented Respondent.

For all the above-provided reasons, SCDC's undersigned counsel respectfully urges this Court to grant his instant motion and, by doing so, extend the deadline by which SCDC may file and serve its brief in support of its petition for writ of certiorari until Wednesday, May 13, 2020.

**RESPECTFULLY SUBMITTED:**

**s/Lake E. Summers**

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Counsel for the South Carolina  
Department of Corrections

Columbia, South Carolina  
April 13, 2020

Self-represented Respondent:  
Thomas J. Torrence, #094651  
Perry Correctional Institution – 3B102  
430 Oaklawn Drive  
Pelzer, South Carolina 29669

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**PROOF OF SERVICE**

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I certify that I have served the **MOTION FOR A 30-DAY EXTENSION OF THE DEADLINE BY WHICH THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS MAY FILE ITS BRIEF IN SUPPORT OF ITS PETITION FOR WRIT OF CERTIORARI** on the above named self-represented Respondent by mailing a copy to him, first class postage pre-paid, at the following address:

Thomas J. Torrence, #094651  
Perry Correctional Institution – 3B102  
430 Oaklawn Drive  
Pelzer, South Carolina 29669

*s/Lake E. Summers*

Lake E. Summers  
SC Bar # 0064146  
**Malone, Thompson, Summers & Ott LLC**