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**Nov 25 2020**

**SC Court of Appeals**

November 25, 2020

Ms. Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Kelsey v. South Carolina Department of Probation, Parole and Pardon Services  
Case No. 19-ALJ-15-0061

Dear Ms. Kitchings,

The initial brief of appellant and designation of matter in the above referenced case is due to be served and filed on November 30, 2020. We respectfully request an extension of thirty days, to and including December 30, 2020, in which to serve and file this initial brief. Undersigned counsel at Justice 360 represents death row inmate Richard Moore in his federal habeas proceedings, and he has an execution date currently set for December 4th, 2020. Justice 360 is engaged in various litigation in state and federal court related to his imminent execution.

By copy of this letter, I am informing Mr. Matthew Buchanan, Esquire, General Counsel for the Department of Probation, Parole, and Pardon Services, of our request.

Thank you for your assistance in this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

  
Megan Barnes

cc: Matthew Buchanan, Esq.  
Hannah Freedman, Esq.  
John H. Blume, Esq.  
Jon Ozmint, Esq.