

RECEIVED

MAR 25 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
SHIRLEY C. ROBINSON, ADMINISTRATIVE LAW JUDGE

CASE NO:19-ALJ-04-0271-AP

APPELLATE CASE NO:2019-001628

NATHANIEL JOHNSON, JR. #211574,

APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS,

RESPONDENT,

APPELLANT'S MOTION FOR EQUITABLE ADOPTION OF TIME

PLEASE TAKE JUDICIAL NOTICE, THAT NATHANIEL JOHNSON, JR. #211574, AN PRO-SE APPELLANT, WHO HEREBY MOVE WITH AN MOTION FOR EQUITABLE ADOPTION OF TIME TO FILE HIS FINAL REPLY BRIEF. APPELLANT RESPECTFULLY ASKS THIS HONORABLE COURT, TO CONSIDER HIS FILING OF AN LATE FINAL REPLY BRIEF, DUE TO THE PANDEMIC AND HIS HEAVY WORKLOAD OF LITIGATING HIS CONVICTION AND SENTENCE.

BASED UPON THE DUE DILIGENCE OF THE APPELLANT'S PERFORMANCE OF A PROFESSIONAL OR FIDUCIARY DUTY WITH REGARDS TO THE RULES AND PROCEDURES. APPELLANT WAS GIVEN NOTICE FROM THE COURT, DATED MARCH 16TH, 2021, AND IT STATED THAT THE APPELLANT HAS (10) TEN DAYS FROM THE DATE OF NOTICE, TO FILE AND SERVE HIS FINAL REPLY BRIEF OR THAT IT WILL NOT BE CONSIDERED.

ON MARCH 22ND, 2021, APPELLANT RECEIVED THIS NOTICE, AND DUE TO LATE NOTICE BEING RECEIVED, THE APPELLANT RESPECTFULLY ASKS FOR CONSIDERATION OF HIS FINAL REPLY BRIEF. APPELLANT ASSERTS THAT FOR GOOD CAUSE SHOWN, HIS MOTION TO PROCEED IN THIS MATTER SHOULD BE GRANTED, AS JUSTICE IS SO REQUIRED, AS A MATTER OF LAW.

RESPECTFULLY SUBMITTED,

DATED: 3/23/, 2021.

/s/ Mr. Nathaniel Johnson Jr. #211574

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
SHIRLEY C. ROBINSON, ADMINISTRATIVE LAW JUDGE  
CASE NO:19-ALJ-04-0271-AP

MAR 25 2021

SC Court of Appeals

APPELLATE CASE NO:2019-001628

NATHANIEL JOHNSON, JR. #211574,

APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS,

RESPONDENT,

PROOF OF SERVICE

THE UNDERSIGNED COUNSEL, HEREBY CERTIFY THAT ON THIS 23<sup>rd</sup> DAY OF March, 2021, A TRUE COPY OF THE APPELLANT'S MOTION FOR EQUITABLE ADOPTION OF TIME TO FILE AND SERVE HIS FINAL REPLY BRIEF, HAVE BEEN SERVED UPON THE RESPONDENT, IMANI BYAS, STAFF ATTORNEY, OFFICE OF GENERAL COUNSEL, SOUTH CAROLINA DEPARTMENT OF CORRECTIONS, P.O. BOX 21787, COLUMBIA, S.C. 29221.

DATED: 3/23/, 2021.

RESPECTFULLY SUBMITTED,

/s/ Mr. Nathaniel Johnson Jr. #211574  
MR. NATHANIEL JOHNSON, JR. #211574  
ACI. BAMBERG UNIT F-4 B#26  
1057 REVOLUTIONARY TRAIL HWY 47  
P.O. BOX 1151  
FAIRFAX, S.C. 29827  
PRO-SE APPELLANT

Dated: Tues. March 23<sup>rd</sup> 2021

The Honorable Jenny A. Kitchings, Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

**RECEIVED**  
MAR 25 2021  
SC Court of Appeals

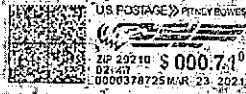
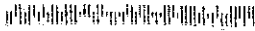
RE: To file the Appellant's Final Reply Brief, along  
with an Motion for Equitable Adoption of Time.

Nathaniel Johnson Jr. #211574, Appellant,  
-vs- South Carolina Department of Corrections, Respondent  
Appellate Case No's 2019-001627, #2019-001628

Dear Mrs. Kitchings

Enclosed you will find the original of each  
case and one copy to be sent back to me after  
being date stamped. If there is any additional  
copies needed please direct so. Thank you kindly!

Sincerely,  
1st Mr. Nathaniel Johnson Jr. #211574  
Mr. Nathaniel Johnson Jr. #211574  
ACI. Bamberg Unit F-3 B#26  
1057 Revolutionary Trail Hwy 47  
P.O. Box 1151  
Fairfax, SC. 29827  
Pro-se Appellant



Mr. Nathaniel Johnson Jr. # 211574

ACI Bamberg Unit F-4 B#26

PO Box 1151

1057 Revolutionary Trail Hwy #7

Fairfax, SC 29827

RECEIVED  
MAR 25 2021  
SC Court of Appeals

The Honorable Jimmy A. Kitchings  
Clerk, South Carolina Court of Appeals

PO Box 11629

Columbia, SC 29211

LEGAL MAIL