

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-04-0240-AP

RECEIVED

MAR 25 2021

SC Court of Appeals

APPELLATE CASE NO:2019-001627

NATHANIEL JOHNSON, JR. #211574,

APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS,

RESPONDENT,

APPELLANT'S MOTION FOR EQUITABLE ADOPTION OF TIME

PLEASE TAKE JUDICIAL NOTICE, 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.

DATED: 3/23/, 2021.

RESPECTFULLY SUBMITTED

/s/ Nathaniel Johnson Jr. #211574

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PROOF OF SERVICE

THE UNDERSIGNED COUNSEL, HEREBY CERTIFY THAT ON THIS 23rd 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.

RESPECTFULLY SUBMITTED,

DATED: 3/23/, 2021.

/s/ Mr. Nathaniel Johnson Jr. #211574

MR. NATHANIEL JOHNSON, JR. #211574
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