

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ELEVENTH JUDICIAL CIRCUIT COURT

R. Knox McMahon, Judge

Trial Court Case No. 2012-CP-32-01294
Appellate Case No. 2013-000314

RECEIVED

JUN 25 2013

SC Court of Appeals

Scarlet Williams Appellant,

v.

Lexington County Zoning Respondent.

**APPELLANT'S MOTION FOR A 30-DAY EXTENSION
BY WHICH TO FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER**

Appellant received the transcript of hearing from Court Reporter Brenda Sigwald on May 29, 2013.

Thus, the Appellant's Initial Brief and Designation of Matter would be due on Thursday, June 27, 2013.

However, the Appellant, by and through her undersigned counsel, now respectfully moves the Court for a 30-day extension of the deadline by which to file the Initial Brief and Designation of Matter in the instant case. The Appellant's undersigned counsel so moves for such an extension in light of other matters to which they have devoted their attention since receiving the transcript on May 29, 2013.

The Appellant's undersigned counsel represents defendants in the following cases currently pending in United States District Court for the District of South Carolina: *U.S. v. Lane*, 1:10-CR-00968; *U.S. v. Harrington*, 4:10-CR-00203; *U.S. v. Carroll*, 1:13-CR-00482; *U.S. v. Brown*, no case number assigned.

For the past several weeks, the Appellant's undersigned counsel has been engaged in plea negotiations and discovery review in the *Brown* matter, which is an IRS prosecution involving significant discovery. Counsel for Appellant has also been engaged in ongoing discovery and negotiations in the *Lane* case. The *Lane* matter is a RICO prosecution of an alleged street gang

involving voluminous discovery and daily activity. Further, the *Harrington* case involves a re-sentencing pursuant to the Fair Sentencing Act of 2010 and counsel has had to travel to Florence, South Carolina to prepare revised sentencing materials within the court imposed fifteen-day deadline.

The Appellant's undersigned counsel also represents defendants in the following cases pending or resolved since May 29, 2013 in the United States District Court for the Western District of North Carolina: *U.S. v. Collins*, FAVFOOAE, et al., *U.S. v. Owens*, FAVE0070, et al., involving two defendants named in multiple counts of a 3 year undercover Forest Service investigation involving bear and deer poaching; *U.S. v. Caswell*, CR3428459, involving misdemeanor charges on the Blue Ridge Parkway. *U.S. v. Arrowood*, 1:05-CR-00256; *U.S. v. Griffin*, 2:09-CR-00002; and *U.S. v. Walkingstick*, 2:11-CR-00012.

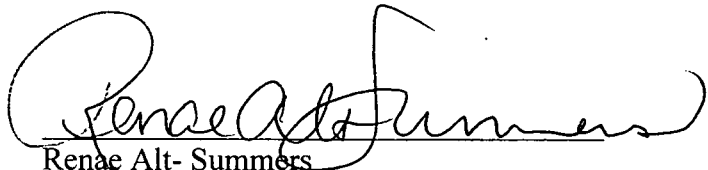
All the above-mentioned cases have had hearings requiring the undersigned counsel's presence within the month of June, 2013 in Bryson City and Asheville, North Carolina.

Finally, Appellant's undersigned counsel is travelling to West Virginia on June 24, 2013 thru June 30, 2013 to attend the wedding of her oldest daughter on June 29, 2013 in Keyser, West Virginia.

The Appellant's deadline has not been previously extended, and the extension she seeks by this instant motion will not prejudice the Respondent. The Respondent's counsel, Jeff M. Anderson, Esquire, graciously offered his consent to the instant motion to the Appellant's undersigned counsel via email on June 21, 2013.

Thus, in light of the above-described events, the Appellant's undersigned counsel seeks a 30-day extension by which to file the Appellant's Initial Brief and Designation of Matter in the instant case.

RESPECTFULLY SUBMITTED,



Renae Alt-Summers
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Counsel for Appellant

Columbia, South Carolina
June 21, 2013.

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R. Knox McMahon, Judge

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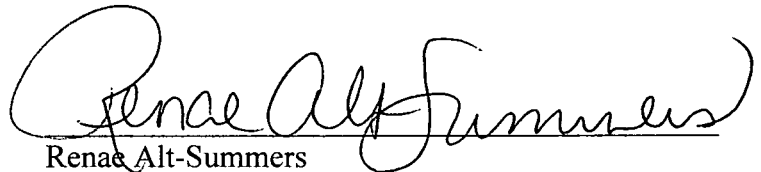
Lexington County Zoning Respondent.

PROOF OF SERVICE

I certify that I have served the Appellant's **MOTION FOR 30-DAY EXTENSION BY WHICH TO FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER** on the above named Respondent by mailing a copy of said motion to its counsel, first class postage pre-paid, at the following address:

Jeff M. Anderson, Esquire
Davis Frawley, LLC
Post Office Box 489
Lexington, South Carolina 29071

June 21, 2012


Renae Alt-Summers

THE GIESE LAW FIRM, LLC

1315 Blanding Street
Columbia, SC 29201
803-708-6767

W. Barney Giese, Esq.
Keith Giese, Esq.
Kelly Giese, Esq.

Justin M. Kata, Esq.
Renaë Alt-Summers, Esq.*

June 21, 2013

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

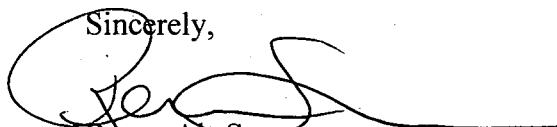
RE: Scarlet Williams v. Lexington County Board of Zoning Appeals, Case No. 2013-000314

Dear Ms. Kitchings:

Enclosed for filing is Appellant's Motion for a 30-Day Extension by Which to File the Initial Brief and Designation of Matter in the above case. Also enclosed is proof of service of the Motion on the respondent.

Thank you for your attention to this matter

Sincerely,



Renaë Alt-Summers
The Giese Law Firm
Attorney for Appellant

cc: Jeff M. Anderson
Post Office Box 489
Lexington, SC 29071-0489
(803) 359-2512
Attorney for Respondent

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