

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Orangeburg County  
Edgar W. Dickson, Circuit Court Judge

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**RECEIVED**  
SEP 18 2013  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

HENRY HAYGOOD,

APPELLANT

APPELLATE CASE NO. 2012-211961

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO SERVE AND FILE THE RECORD ON APPEAL

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Counsel for Henry Haygood respectfully requests an extension of thirty (30) days in which to serve and file the Record on Appeal in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009, and Rule 240, SCACR. This is a first request for an extension. In support of this request, counsel shows:

1. The record on appeal is due to be served upon opposing counsel today.
2. Counsel for Mr. Haygood respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time, which include the following:
  3. The public defender's office in which Counsel works only recently acquired the software necessary to properly compile, redact, and produce the record on appeal in this case. Also, over the past month, Counsel has been in the Court of General Sessions during the weeks of August 12, 2013, August 26, 2013, and September 9, 2013. Further, Counsel argued the cases of State v.

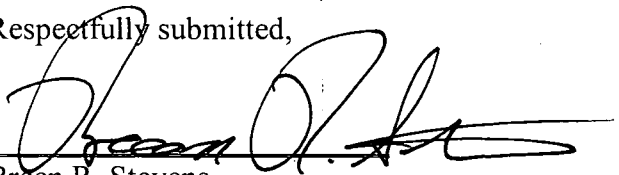
Leonard Goodwin on September 10, 2013, and State v. James Lamarcus Page on September 11, 2013, in this Court.

4. Counsel makes this request in good faith and not for purpose of delay. **Counsel will continue to work on the record on appeal in this case so that it may be filed this week.**

5. Counsel for the Attorney General's office has been contacted by telephone, and verbally consented to the motion.

WHEREFORE, the undersigned counsel would respectfully request an additional thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Breen R. Stevens  
Public Defender  
First Judicial District

Attorney for Appellant

This 16th day of September, 2013.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Orangeburg County  
Edgar W. Dickson, Circuit Court Judge

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SEP 19 2013  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

HENRY HAYGOOD,

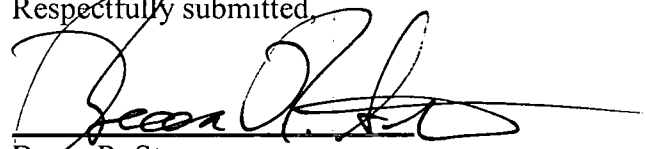
APPELLANT

APPELLATE CASE NO. 2012-211961

CERTIFICATE OF SERVICE

I certify that a true copy of the motion for an extension of time in which to file the Motion for an Extension of Time in which to Serve and File the Record on Appeal to the Court of Appeals in the above case has been served upon Julie Kate Keeney, Esquire, Assistant Attorney General, Office of the Attorney General, P.O. Box 11549, Columbia, SC 29211, and the South Carolina Court of Appeals, this 16th day of September, 2013.

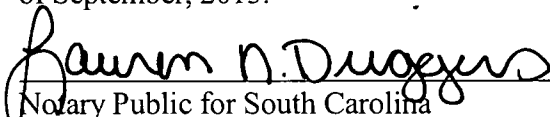
Respectfully submitted,



Breen R. Stevens  
Public Defender  
First Judicial District

Attorney for Appellant

SWORN TO BEFORE ME this 16<sup>th</sup> day  
of September, 2013.

  
Notary Public for South Carolina

My Commission Expires: March 5, 2018



# Office of the Public Defender

First Judicial Circuit



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September 16, 2013

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

**Re:** State v. Henry Haygood  
Appellate Case No.: 2012-211961

**RECEIVED**  
SEP 19 2013  
SC Court of Appeals

Dear Ms. Kitchings:

The Record on Appeal is due to be served today, September 16, 2013. I am requesting a 30-day extension to file these documents. This is the first extension request in this case, and it is not intended for the purpose of delay.

Thank you for your assistance in this matter.

Sincerely,

ORANGEBURG COUNTY PUBLIC DEFENDER

A handwritten signature in black ink, appearing to read "Breen R. Stevens".

Breen R. Stevens, Esq.  
Assistant Public Defender

BRS/ldk  
Enclosure: As stated.  
cc: Julie Kate Kenney, Esquire

Handwritten scribbles and a wavy line.

A small, simple handwritten mark or symbol.