

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY

Thomas A. Russo, Jr., Circuit Court Judge

C.A. No. 2012-212940

RECEIVED

OCT - 4 2013

S.C. Supreme Court

DOMONIQUE BROWN.....Petitioner,

vs.

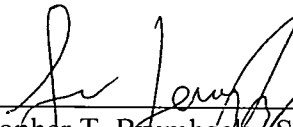
STATE OF SOUTH CAROLINA..... Respondent.

MOTION FOR CONTINUANCE

Petitioner hereby moves for the Court to grant Petitioner's Motion for Continuance to extend the due date for the Petition of Certiorari and Appendix on this case. This Motion is based on the grounds that on September 5, 2013 the Supreme Court of South Carolina denied counsel's motion to be relieved as counsel in the above referenced case and set a due date for the petition for Certiorari and Appendix on October 7, 2013. Counsel respectfully makes this motion for a continuance due to the heavy non pro bono work load they are currently experiencing and the shortness in period of time between counsel's motion to be relieved and the due date for the Petition for Certiorari and Appendix.

Respectfully Submitted,

BRUMBACK & LANGLEY, LLC



Christopher T. Brumback / S.C. Bar # 75410
Spencer D. Langley / S.C. Bar # 77686
1 Augusta Street, Suite 301-D
Greenville, SC 29601
(864) 414-9097

Date: October 1, 2013
Greenville, South Carolina

ATTORNEYS FOR PETITIONER
Domonique Brown

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY

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DOMONIQUE BROWN.....Petitioner,


vs.

STATE OF SOUTH CAROLINA..... Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that on this 1st day of October 2013, counsel of record for Respondent was served with a copy of Petitioner's Motion for Continuance through United States Postal Service First Class Mail in accordance with the South Carolina Rules of Civil Procedure and the South Carolina Rules of Appellate Procedure.

BRUMBACK & LANGLEY, LLC



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Spencer D. Langley / S.C. Bar # 77686
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Greenville, SC 29601
(864) 414-9097

ATTORNEYS FOR PETITIONER
DOMONIQUE BROWN

Date: October 1, 2013
Greenville, South Carolina

BRUMBACK & LANGLEY, LLC
ATTORNEYS & COUNSELORS AT LAW

CHRISTOPHER T. BRUMBACK, ESQ.
SPENCER D. LANGLEY, ESQ.

1 AUGUSTA STREET, SUITE 301-D
GREENVILLE, SOUTH CAROLINA 29601
TELEPHONE (864) 414-9097
FACSIMILE (864) 232-4984
E-MAIL: SPENCER@BRUMBACKLANGLEY.COM

GENERAL & COMPLEX LITIGATION
BUSINESS AND CORPORATE LAW
CRIMINAL DEFENSE
ASSET PROTECTION

October 1, 2013

VIA US MAIL

Daniel E. Shearouse
Clerk of Court for the Supreme Court
PO BOX 11330
Columbia, South Carolina 29211

Re: *Dominique Brown v. State of South Carolina*
Case Tracking No. 2012-212940

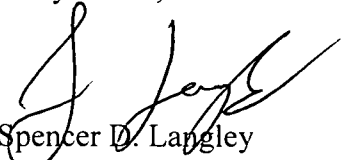
Dear Mr. Shearouse:

Enclosed herewith, please find Two (2) copies of Petitioner's Motion for continuance. Your office has expressed that the Twenty-Five Dollar filing fee has been waived since this is a pro bono case for an indigent client. Please stamp both copies and return one in the envelope provided.

If you have any questions or should require anything further from my office, please do not hesitate to contact my office at (864) 979-7630.

With kindest regards, I am

Truly Yours,


Spencer D. Langley
Brumback & Langley, LLC

CTB/ecn
Enclosures

cc:

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S.C. Supreme Court