

RECEIVED

Apr 24 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

Debra McCaslin, Circuit Court Judge

Appellate Case No. 2024-001644

The State,

Respondent,

v.

Jabin E. Trapp,

Appellant.

MOTION FOR EXTENSION OF TIME

This matter is before the Court on the undersigned Counsel's Motion for Extension of Time to file the Initial Brief of Appellant and Designation of Matter in the above-captioned case.

The Initial Brief of Appellant and Designation of Matter is due on **April 24, 2025**.

I, Dayne C. Phillips, Esq., respectfully request a thirty (30) day extension of time to serve and file the Initial Brief of Appellant and Designation of Matter. This is Counsel's **first** request for an extension of time and is not intended for purposes of delay as it is reasonable and necessary due to Counsel's work schedule.

I notified Senior Assistant Deputy Attorney General Melody Brown of this request via email, and she consented to this request.

THEREFORE, Appellant respectfully requests a thirty (30) day extension for the service and filing of the Initial Brief of Appellant and Designation of Matter in this case.

Respectfully Submitted,

s/ Dayne C. Phillips

Dayne C. Phillips, Esq.

PRICE BENOWITZ LLP

1614 Taylor Street, Suite D.

Columbia, SC 29201

O: 803-272-4503

C: 803-807-0234

F: 803-380-8035

dayne@pricebenowitz.com

ATTORNEY FOR APPELLANT

April 24, 2025

RECEIVED

Apr 24 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

Debra McCaslin, Circuit Court Judge

Appellate Case No. 2024-001644

The State,

Respondent,

v

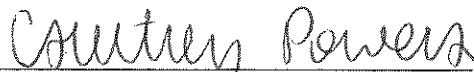
Jabin E. Trapp,

Appellant.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the within and foregoing Motion for Extension of Time by emailing and depositing a true and correct copy of the same via first-class mail, postage prepaid, upon all parties as follows:

Melody Brown, Esq., S.C. Attorney General's Office, PO Box 11549, Columbia, SC 29211



Courtney Powers
Paralegal

1614 Taylor Street, Suite D.
Columbia, SC 29201
C: (803) 216-5561
F: (803) 380-8035
courtney@pricebenowitz.com

April 24, 2025

PRICE BENOWITZ LLP

DAVID BENOWITZ
ADMITTED DC, MD & VA
DAYNE PHILLIPS
ADMITTED SC
JOHN YANNONE
ADMITTED MD & DC
KERRI CASTELLINI
ADMITTED DC, MD & VA
KUSH ARORA
ADMITTED MD & DC
NICOLAS TORRES
ADMITTED FL
SEAN O-BRIEN
ADMITTED IL
PETER KENT ODOM
ADMITTED DC, MD, VA, NH & GA
RAMMY BARBARI
ADMITTED DC & VA
MARVIN OCHOA
ADMITTED MD
ARREN WALDREP
ADMITTED DC, MD & SC
KENNETH LADUCA
ADMITTED DC, MD & VA
JEFF STICKLE
ADMITTED MD & DC
FARRAL HABER
ADMITTED FL, VA & DC
PAULETTE PAGÁN
ADMITTED DC, MD & MO
RYAN HUTTAR
ADMITTED VA
DONNA MURPHY
ADMITTED VA & DC
JEANNE BROWN
ADMITTED VA & DC
TAYLOR COMSTOCK
ADMITTED MD, DC & VA
ELIANE MAKHLOUF
ADMITTED MD & DC
TONY MUNTER
ADMITTED DC, MA & MD
DRAKE BIRNBAUM
ADMITTED DC & MD

1614 TAYLOR STREET
SUITE D
COLUMBIA, SC 29201
OFFICE: (803) 272-4503
DIRECT: (803) 807-0234
FAX: (803) 380-8035

SETH PRICE
ADMITTED DC & NY
TAMMY BEGUN
ADMITTED DC & MD
KARIN RILEY PORTER
ADMITTED VA
SETH OKIN
ADMITTED MD
DENNIS SOMECH
ADMITTED DC & VA
ABIGAIL BEICHLER
ADMITTED MD
JOEL NIED
ADMITTED VA, PA & GA
MICHAEL LEE
ADMITTED VA & CO
CHAD PROPST
ADMITTED SC
DAMIEN SMITH
ADMITTED DC & VA
W. ANDREW PATZIG
ADMITTED DC & VA
SUKHPREET "VICK" SINGH
ADMITTED SC
KEN KOPPELMAN
ADMITTED IL, DC & VA
RAYAN MOMENAH
ADMITTED DC & MD
HANNAH AMUNDSON
ADMITTED FL, DC & MD
JUSTIN TURNER
ADMITTED MD & DC
KIMBERLY PHILLIPS
ADMITTED VA & DC
ANDREW LINDSEY
ADMITTED VA
EVA SWANSON
ADMITTED VA
ASHLEY WILSON
ADMITTED VA & DC
BRIAN MORRIS
ADMITTED DC, TX & IL
KEVIN KELLEY
ADMITTED MD, SC & FL

*OF COUNSEL

409 7TH STREET NW, SUITE 200
WASHINGTON, DC 20004

10505 JUDICIAL DRIVE, SUITE 203
FAIRFAX, VA 22030

April 24, 2025

The Honorable Jenny Kitchings
Clerk of Court, SC Court of Appeal
P.O. Box 11629
Columbia, SC 29211

RECEIVED
Apr 24 2025
SC Court of Appeals

Re: State v. Jabin E. Trapp
MOTION FOR EXTENSION OF TIME
Appellate Case No.: 2024-001644

Dear Ms. Kitchings:

I have enclosed the original Motion for Extension of Time, along with a Certificate of Service that I also emailed for filing today in the above-referenced case. Thank you for your assistance with filing this document.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

cc: **Jabin E. Trapp**
Melody Brown, Esq.

s/ Dayne C. Phillips
Dayne C. Phillips, Esq.

WWW.SCCRIMINALLAWS.COM

WWW.PRICEBENOWITZ.COM