

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Greenville County

The Honorable G. Edward Welmaker, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

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**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

ERICK E. HEWINS,

APPELLANT

Appellate Case No. 2013-000224  
\_\_\_\_\_

PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER  
\_\_\_\_\_

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served on or before December 2, 2013.
2. Counsel for Appellant, Ms. Jessica H. Lerer, requests additional time to properly research and brief this matter, including speaking with previous trial counsel for Appellant. Due to scheduling conflicts, and through no fault of either party, she has been unable to speak to Appellant's trial counsel up until this point, although they have exchanged correspondence.

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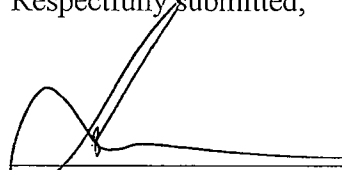
**SC Court of Appeals**

3. This request is made in good faith, and not for purposes of delay. Furthermore, Counsel has relayed to Appellant her intention to seek an extension in the initial brief deadline of this matter.

4. Counsel has spoken with Ms. Salley Elliott, the Attorney General assigned to this case, and Ms. Elliott has indicated that she has no objection to Counsel's request for an extension.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel further requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Jessica H. Lerer  
Attorney at Law  
STROM LAW FIRM, LLC  
2110 N. Beltline Boulevard  
Columbia SC, 29204  
Telephone: (803) 252-4800  
Facsimile: (803) 252-4801  
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November 18, 2013

cc:

Robert Michael Dudek  
Salley W. Elliott  
Alan McCrory Wilson

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM GREENVILLE COUNTY  
THE HONORABLE G. EDWARD WELMAKER, CIRCUIT COURT JUDGE

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THE STATE,

RESPONDENT,

V.

ERICK E. HEWINS,

APPELLANT

APPELLATE CASE NO. 2013-000224

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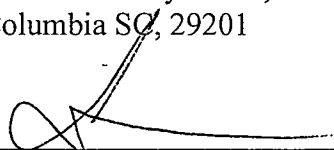
CERTIFICATE OF SERVICE

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I hereby certify that I have this day filed Appellant's motion for extension to file initial brief with or served a copy thereof on the persons named herein, by forwarding via hand delivery, at the places and addresses listed below:

Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
1015 Sumter Street  
Columbia SC, 29201

Salley Elliott  
S.C. Office of Attorney General  
Rembert Dennis Building  
1000 Assembly Street, Room 519  
Columbia SC, 29201



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Jessica H. Lerer  
STROM LAW FIRM  
2110 N. Beltline Boulevard  
Columbia, South Carolina  
(803) 252-4800  
Attorney for Appellant

Columbia, South Carolina  
This 20<sup>th</sup> day of November, 2013

J. P. STROM, JR. P.A.<sup>†</sup>  
MARIO A. PACELLA\*  
JOHN R. ALPHIN<sup>†</sup>  
BAKARI T. SELLERS<sup>†</sup>  
JESSICA H. LERER<sup>†</sup>  
ALEXANDRA BENEVENTO<sup>†</sup>

\* ALSO ADMITTED IN S.C. AND N.Y.  
† ADMITTED IN S.C. ONLY

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November 20, 2013

**VIA UNITED STATES MAIL**

Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
1015 Sumter Street  
Columbia SC, 29201

Re: The State v. Eric Hewins  
Appellate Case No.: 2013-000224  
Appellant's Motion for Extension for Filing Initial Brief

Clerk Kitchings:

Enclosed, along with this letter, is a clocked copy of Appellant's motion for an extension filed with your Court today, along with proof of service. This motion has been served upon counsel for the State via hand delivery. Please feel free to contact me with any questions or concerns. Thank you.

Sincerely,



Jessica H. Lerer  
STROM LAW FIRM, LLC

JHL

cc:  
Robert Dudek  
Salley Elliot

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SC Court of Appeals