

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

The Honorable Roger L. Couch, Circuit Court Judge

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NOV 25 2013

Appellate Case No. 2013-001690

SC Court of Appeals

The State.....Respondent,

v.

Kenneth Jowan CraigAppellant.

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL
BRIEF AND DESIGNATION OF MATTER FOR THE RECORD ON APPEAL**

Pursuant to Rules 240 and 263(b), SCACR, Appellant Kenneth Jowan Craig, by and through the undersigned counsel, requests a 30-day extension of time in which to file his Initial Brief and Designation of Matter for the Record on Appeal. While pro bono counsel for the Appellant has diligently worked to timely prepare this appeal, unforeseen scheduling difficulties in the month of November, including the time constraints of a prolonged hearing in front of the Chief Procurement Officer of this State, have left counsel without adequate time to prepare the Initial Brief prior to the expiration of the current deadline.

AIB 2nd
12/02/13

The current deadline for filing the Initial Brief and Designation of Matter for the Record on Appeal is Monday, December 2, 2013 and has not previously been extended. Appellant respectfully requests a 30-day extension of time so that the new deadline will be Thursday, January 2, 2014. Counsel for Appellant will file the Initial Brief in advance of the deadline to the extent possible.

The undersigned counsel for Appellant certifies that he contacted Salley Elliott, Assistant Attorney General, regarding the contents of this Motion and was informed that Respondent consents to the same.



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ATTORNEYS FOR THE APPELLANT

Other Counsel of Record:

Salley Elliott
Assistant Attorney General
South Carolina Attorney General's Office
1000 Assembly Street
Columbia, SC 29201

ATTORNEY FOR THE RESPONDENT

November 25, 2013

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The State.....Respondent,

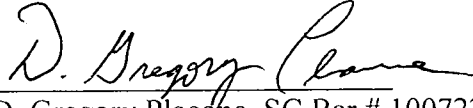
v.

Kennth Jowan CraigAppellant.

PROOF OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter for the Record on Appeal* has been served upon counsel of record via hand delivery on the 25th day of November, 2013, to address shown below.

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ATTORNEYS FOR THE APPELLANT

Columbia, South Carolina

November 25, 2013

D. Gregory Placone
Associate
Admitted in SC, FL

November 25, 2013

VIA HAND DELIVERY

The Hon. Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

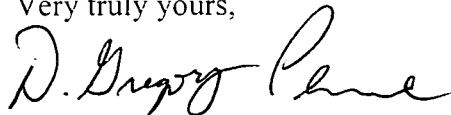
Re: *The State v. Kenneth Jowan Craig*
Appellate Case No. 2013-001690

Dear Ms. Kitchings:

On behalf of Appellant Kenneth Jowan Craig, please find enclosed an original and eight (8) copies of a *Motion for Extension to File Appellant's Initial Brief* and *Designation of Matter for Record on Appeal*.

Please return two clocked-in copies of the Motion to our courier. Thank you.

Very truly yours,



D. Gregory Placone

DGP/bn
Enclosure

cc: Robert Michael Dudek (via email, w/encl.)
Salley W. Elliott, Assistant Attorney General (via hand delivery, w/encl.)

- Charleston
- Charlotte
- Columbia**
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- Hilton Head
- Myrtle Beach
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