

LAW OFFICE OF
Kristy Grafton Goldberg, LLC
ATTORNEY AT LAW

November 26, 2013

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

RE: Randy Thomas v. State of South Carolina
Civil Action No. 04-CP-40-1915
Appellate Case No. 2013-001287

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DEC 02 2013
SC Court of Appeals

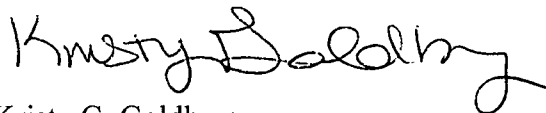
Dear Ms. Kitchings:

This letter is to advise the Court that I am in receipt of the transcript in the above-referenced matter. I calculate the Initial Appellant's Brief as due on December 21, 2013.

Please also find enclosed a Motion for an Extension of Time in this matter which has been also served on opposing counsel. I would appreciate it if you could file the Motion and mail a date-stamped copy back to me in the enclosed pre-stamped envelope.

Please let me know if you have any additional questions or concerns regarding this matter.

Very truly yours,



Kristy G. Goldberg

CC: Robert Corney
Assistant Attorney General
Post Office Box 11549
Columbia, South Carolina 29211-1549

Mr. Randy Thomas, SCDC #313802

McCormick Correctional Institution
386 Redemption Way
McCormick, South Carolina 29899

Office of Appellate Defense
Chief Appellate Defender – Robert Dudek
PO Box 11433
Columbia, SC 29211-1433

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY

The Honorable G. Thomas Cooper, Jr.
Circuit Court Judge

Case No. 2012-CP-40-01543
Appellate Case No. 2013-001287

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DEC 02 2013

SC Court of Appeals

Randy Thomas,

Petitioner,

v.

State of South Carolina,

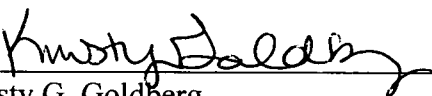
Respondent.

Motion for an Extension of Time

Pursuant to Rules 208(a)(1) and 240 of the South Carolina Appellate Court Rules, Appellant Randy Thomas requests a thirty (30) day extension of time to file his Initial Appellant's Brief and Designation of Matter in the above-captioned matter. This is the first request for an extension of this deadline.

Counsel only learned of her appointment to represent the Petitioner in this matter when informed by the Office of Indigent Defense on November 22nd. This request for an extension of time is necessitated because counsel's court schedule and other deadlines will not allow her to complete the Initial Appellant's Brief within the current deadline. Currently, the Appellant's Brief is due on December 21, 2013. With the additional thirty (30) day extension, the Appellant's Brief will be due Monday, January 20, 2014, per Rule 263, SCACR.

Therefore, counsel respectfully moves this Court for a thirty (30) day extension of time to file its Initial Brief of Appellant in the above-captioned matter until January 20 2014. **Counsel asks that the current deadline be held in abeyance pending the Court's consideration and resolution of this motion.**

By: 
Kristy G. Goldberg
SC Bar No. 72674
E-Mail: kristy@kristygoldberglaw.com
1720 Main Street, Suite 301
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803.252.2299

Attorney for Petitioner

November 26, 2013

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr. Circuit Court Judge

Case No. 2012-CP-40-01543
Appellate Case No. 2013-001287

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DEC 02 2013

SC Court of Appeals

Randy Thomas, SCDC # 313802, Appellant

v.

State of South Carolina, Respondent.

PROOF OF SERVICE

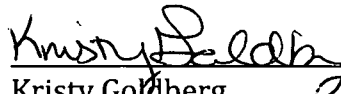
Personally appeared before me, Kristy Goldberg, Esquire, who being duly sworn, deposes
and states:

She is the appointed counsel of record for Applicant;
Service by mail is proper in this instance; and

She has served the MOTION FOR EXTENSION on the following party on November 26,
2013 by depositing one copy in the U.S. Mail, postage prepaid:

Assistant Attorney General, Robert Daniel Corney
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211

November 26, 2013



Kristy Goldberg
Attorney for Appellant

Law Office of Kristy Goldberg, LLC.
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kristy@kristygoldberglaw.com