

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM CHESTERFIELD COUNTY  
Court of General Sessions

J. Michael Baxley, Circuit Court Judge

Case No. 2013-000148

RECEIVED

DEC 11 2013

SC Court of Appeals

The State of South Carolina,.....Appellant,

v.

Graham Franklin Douglas,.....Respondent.

**MOTION FOR EXTENSION OF TIME**

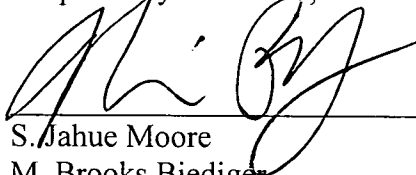
Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney, counsel for Respondent Graham Franklin Douglas moves for an extension of the deadline for serving and filing the Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal. These documents were due originally to be filed by Respondent on December 12, 2013. At present, counsel is under an unusually heavy trial and appeal schedule, and will be unable to complete these documents by the December 12<sup>th</sup> deadline.

This motion is further made on the grounds that a recent decision of the Supreme Court will require additional preparation which was not necessary prior to the Supreme Court's decision in *State v. Curry*. Accordingly, counsel respectfully moves for a ten (10) day extension in which to file the Respondent's Initial Brief and Designation of Matter, to December 23, 2013.

RIB 3<sup>rd</sup>

Alphonso Simon, Jr., Assistant Attorney General with the South Carolina Attorney General's Office has been contacted and indicates that he does not object to this extension request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Moore', written over a horizontal line.

S. Jahue Moore  
M. Brooks Biediger  
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P.O. Box 5709  
West Columbia, South Carolina 29171  
Telephone: 803-796-9160

Attorneys for Respondent Graham Douglas

West Columbia, South Carolina

December 11, 2013

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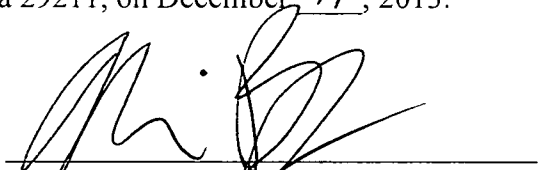
The State of South Carolina,.....Appellant,

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Graham Franklin Douglas,.....Respondent.

**PROOF OF SERVICE**

I certify that I have served the Motion for Extension of Time by mail, to Alphonso Simon, Jr., Esquire, Assistant Attorney General, South Carolina Attorney General's Office, Post Office Box 11549, Columbia, South Carolina 29211, on December 11, 2013.



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