

THE STATE OF SOUTH CAROLINA

In The Supreme Court

APPEAL FROM CHARLESTON COUNTY

Court of General Sessions
J.C. Nicholson, Circuit Court Judge

Court of Appeals Case No. 2013-000179

RECEIVED

MAR 20 2014

SC Court of Appeals

The State of South Carolina,

Respondent,

v.

Venancio Diaz Perez,

Appellant.

MOTION FOR EXTENSION OF TIME

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to the Court today, pursuant to two previous extensions granted by the Court.

II.

Due to other work, including an Initial Brief of Respondent being filed today in another case (State v. Maldonado, Appellate Case No. 2013-000684), I am unable to

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complete this Brief on time. I would therefore request a one (1) week extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

III.

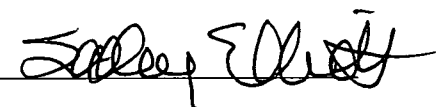
This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for seven (7) days; and for such other and further relief as the Court may deem just and proper.

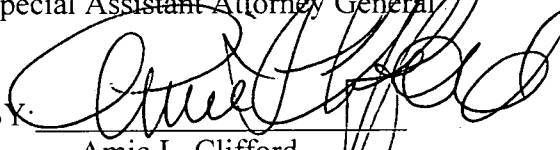
Respectfully submitted,

ALAN WILSON
Attorney General

SALLEY W. ELLIOTT
Senior Assistant Deputy Attorney General

BY: 

AMIE L. CLIFFORD
Special Assistant Attorney General

BY: 
Amie L. Clifford
Special Assistant Attorney General
aclifford@cpc.sc.gov
S.C. Bar No. 1285

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR RESPONDENT


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March 14, 2014

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of General Sessions

Honorable J.C. Nicholson, Jr., Circuit Court Judge
Trial Court Case No. 2010GS1007730, 2010GS1007731
Appellate Case No. 2013-000179

The State of South Carolina,

Respondent,

v.

Venancio Diaz Perez,

Appellant.

PROOF OF SERVICE

I, Ellen DuBois, certify that I have served the Motion for Extension of Time on Appellant, Venancio Diaz Perez, by depositing one copy of such in the United States Mail, first class postage prepaid, on March 20, 2014, addressed to his attorney of record, Jason Scott Luck, Esquire, Seibels Law Firm, P.A. 127 King Street, Suite 100, Charleston, South Carolina 29401.

I further certify that all parties required by Rule to be served have been served.

This 20th day of March, 2014.



ELLEN DUBOIS
Administrative Assistant
Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737



ALAN WILSON
ATTORNEY GENERAL

March 20, 2014

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: State v. Venancio Diaz Perez
Appellate Case Tracking No. 2013-000179

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion Extension Of Time along with proof of service for filing in the above-referenced appeal.

Sincerely,

for Amie L. Clifford
Special Assistant Attorney General

Enclosures

cc: Jason Scott Luck, Esquire
Robert M. Dudek, Esquire
Victim Services

RECEIVED

MAR 20 2014

SC Court of Appeals