

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

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MAR 27 2014

SC Court of Appeals

Appellate Case No: 2013-000376

The State of South Carolina.....Respondent,

v.

Robert Harvey Payne Appellant.

**MOTION TO EXTEND TIME TO FILE INITIAL REPLY BRIEF OF
APPELLANT**

Appellant Robert Harvey Payne moves pursuant to Rule 240, SCACR for an order extending his time to file and serve the Initial Reply Brief for a period of 10 days. Appellant requests this extension in order to provide counsel sufficient time to adequately research and prepare these pleadings. Appellant submits that this motion is not interposed for delay, and will not prejudice Respondent. Appellant also requests that the Court of Appeals hold all time limits in abeyance pending its ruling on this motion.

SIGNATURE PAGE TO FOLLOW

AIRB 18

Respectfully submitted,



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Robert M Dudek
Chief Appellate Defender
SC Commission on Indigent Defense
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March 24, 2014

cc: T. Parkin C. Hunter, Esq
Assistant Attorney General

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PROOF OF SERVICE

I, the undersigned, hereby certify the Motion to Extend Time to File Initial Reply Brief of Appellant in the above referenced matter was mailed, postage prepaid, to T. Parkin C. Hunter, Esq., Assistant Attorney General, at Rembert Dennis Building, 1000 Assembly Street, Columbia, SC 29201, on March 24, 2014.



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March 24, 2014

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March 24, 2014

The Honorable Jenny Abbott Kitchings
SC Court of Appeals Clerk
PO Box 11629
Columbia, SC 29211

Re: *State of South Carolina v. Robert Harvey Payne*
In the Court of General Sessions for Charleston County
C.A. Nos: 2011-GS-10-05232, 2011-GS-10-04844
Appellate Case No: 2013-000376

Dear Ms. Kitchings:

I enclose herewith an original and one copy of a Motion to Extend Time to File Initial Reply Brief on behalf of Appellant. Please file the original and send a clocked copy back to me in the envelope I have enclosed for your convenience. I appreciate your assistance in this regard.

Sincerely,



Ginger D. Goforth
ginger@lazenbylawfirm.com

GDG: jeh
Enclosures

cc: T. Parkin C. Hunter, Esq.
Assistant Attorney General

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SC Court of Appeals

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THE HONORABLE JENNY ABBOTT KITCHINGS
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