

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

Robert E. Hood, Circuit Court Judge

Appellate Case No. 2013-001680

**RECEIVED**

APR 03 2014

**SC Court of Appeals**

71787

Marcus Bailey,.....Appellant,

v.

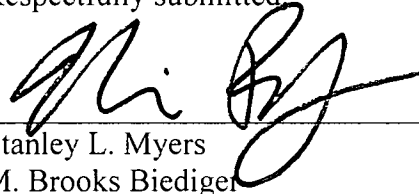
The State of South Carolina,.....Respondent.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney, counsel for Appellant Marcus Bailey, moves for an extension of the deadline for serving and filing the appellant's initial brief and designation of matter to be included in the record on appeal. These documents were due originally to be filed by respondents on March 4, 2014. Counsel sought and was granted an extension of this deadline, and the initial brief and designation are now due to be filed April 3, 2014.

At present, counsel is under an unusually heavy trial and appeal schedule, and will be unable to complete these documents by the April 3rd deadline. Accordingly, counsel respectfully moves for a thirty-day extension in which to file the appellant's initial brief and designation of matter to May 3, 2014.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Stanley L. Myers", written over a horizontal line.

Stanley L. Myers

M. Brooks Biediger

Moore Taylor Law Firm, P.A.

P.O. Box 5709

West Columbia, South Carolina 29171

Telephone: 803-796-9160

Counsel for Appellant.

West Columbia, South Carolina

April 3, 2014.

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Marcus Bailey,.....Appellant,

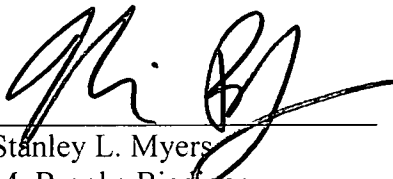
v.

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

PROOF OF SERVICE

I certify that I served the Motion for Extension, by mail, postage prepaid, to  
Respondents' counsel on April 3, 2014 to:

Donald J. Zelenka, Esquire  
Senior Assistant Deputy Attorney General  
South Carolina Attorney General's Office  
P.O. Box 11549  
Columbia, S.C. 29211  
Telephone: 803-734-3601

  
Stanley L. Myers  
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John C. Bradley, Jr.  
Melissa K. Moore  
William B. Fortino  
Ralph Nichols Riley, Jr.  
M. Brooks Biediger  
Amber Cary Fulmer  
Sarah Taylor Cassidy  
Margaret "Meg" Hazel  
Billy C. Coleman (Ret.)

April 3, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29201

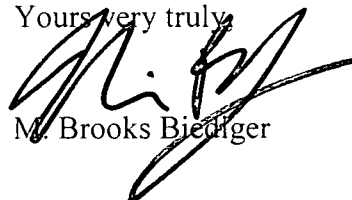
RE: State vs. Marcus Bailey  
Appellate Case No. 2013-001680

Dear Ms. Kitchings:

The Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal is due to be served and filed on April 3, 2014. Because of an unusually heavy workload, I respectfully request a second thirty-day extension of this deadline, to May 3, 2014. Enclosed is our Motion for Extension of Time along with a check for the \$25 filing fee required with this request.

I am enclosing the original and six copies of our Motion for an Extension. By copy of this letter, I am serving Senior Assistant Deputy Attorney General Donald J. Zelenka with the same.

Yours very truly,



M. Brooks Biediger

MBB  
Enclosures  
cc: Donald J. Zelenka, Esquire (w/ copy of encl.)

**RECEIVED**

APR 03 2014

**SC Court of Appeals**