

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of General Sessions

Lee S. Alford, Circuit Court Judge

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Case Nos. 2012-GS-42-2624, 2012-GS-42-2625, 2012-GS-42-2626,  
2012-GS-42-2627, 2012-GS-42-2633, and 2012-GS-42-2634

Appellate Case No. 2012-213228

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The State of South Carolina, Respondent,  
v.  
Ronasha Taylor, Appellant.

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MAY 05 2014

**SC Court of Appeals**

APPELLANT'S PETITION FOR EXTENSION OF TIME TO FILE AND  
SERVE INITIAL REPLY BRIEF

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Respondent filed and served its Initial Brief of Respondent on April 23, 2014. Currently, the Initial Reply Brief of Appellant is due to be filed and served by May 5, 2014. Counsel for Appellant respectfully asks that this Court grant counsel a ten-day extension on this deadline.

In the two weeks preceding the State serving its Initial Brief, counsel for Appellant was out of the office for more than a week on work-related assignments. He also had to dedicate a number of hours preparing for and participating in an event for his church. These work and church activities created a sizeable backlog of work, and counsel is still working to catch back up.

AIRB 1st

This is not to say that counsel has not dedicated much time thus far to preparing a reply brief. Working nights and weekends, counsel has already dedicated more than forty-two hours analyzing the many arguments the State raises in its forty-eight-page brief, conducting legal research, and drafting a brief in reply. Despite these efforts, he will need a substantial amount of additional time to prepare an adequate reply and submit it to Appellate Defense for their review before filing and service.

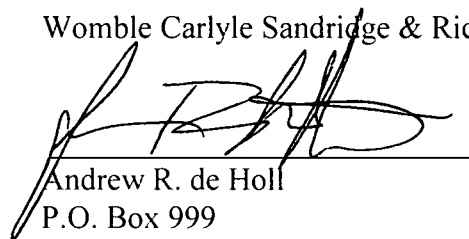
Counsel for Appellant has corresponded with the State's attorney, Assistant Attorney General Christina J. Catoe, about this request. She consents to the requested extension.

Finally, counsel for Appellant submits that this request is not being made for the purposes of delay.

If the Court grants this request, the new deadline will be Thursday, May 15, 2014.

Respectfully submitted,

Womble Carlyle Sandridge & Rice, LLP

A handwritten signature in black ink, appearing to read 'Andrew R. de Holl', is written over a horizontal line.

Andrew R. de Holl  
P.O. Box 999  
Charleston, SC 29402  
(843) 720-4634

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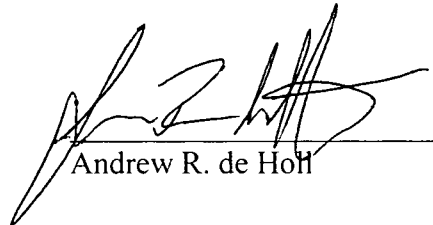
CERTIFICATE OF SERVICE

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I certify that Appellant's Petition for Extension of Time to File and Serve Initial Reply Brief was served upon counsel for Respondent by mailing a copy of the Petition to the following address:

Office of the South Carolina Attorney General  
ATTN: Christina J. Catoe  
Rembert Dennis Building  
1000 Assembly Street  
Columbia, SC 29201

This 30<sup>th</sup> day of April, 2014

  
Andrew R. de Holl

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5 Exchange Street  
Charleston, SC 29401

Mailing Address:  
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Andrew R de Holl  
Direct Dial: 843-720-4634  
Direct Fax: 843-723-7398  
E-mail: adeholl@wcsr.com

April 30, 2014

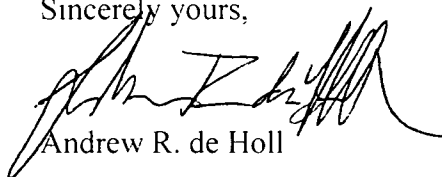
The Honorable Jenny Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: The State v. Ronasha Taylor  
Appellate Case No. 2012-213228  
WCSR File No. 71803.0002.8

Dear Ms. Kitchings:

I am enclosing the original and six copies of a petition for an extension of time to file and serve the Initial Reply Brief of Appellant in this case. Please let me know if the Court requires anything further to consider my petition. Thank you for your assistance and for the Court's consideration in this matter.

Sincerely yours,



Andrew R. de Holl

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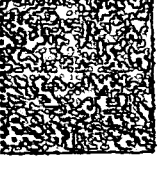
Cc:  
Robert M. Dudek  
Christina J. Catoe

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**SC Court of Appeals**

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