

IN THE SOUTH CAROLINA COURT OF APPEALS

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Appellant Case No. 2012-213141

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The State, Respondent

v.

Alphonso Chaves Thompson, Appellant.

**RECEIVED**

JUN 26 2014

**SC Court of Appeals**

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**MOTION FOR SECOND EXTENSION WITHIN WHICH TO SERVE AND FILE  
APPELLANT'S REPLY BRIEF**

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Appellant, through his undersigned counsel, would respectfully show unto this Court as follows:

**I.**

The Reply Brief of Appellant is due to be served and filed Wednesday, July 2, 2014.

**II.**

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the Appellant moves for a second extension in the above-referenced criminal appeal and asks for an additional thirty days to complete the reply brief in this case.

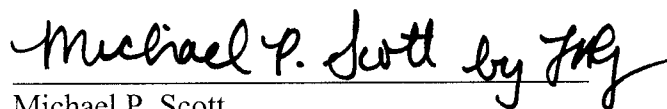
**III.**

This extension request is not intended for purposes of delay, but rather to ensure that the Reply Brief is properly researched and prepared. This pro bono case has required

significant research and drafting in order to respond to the State's very detailed response brief on three separate issues. Indeed, the State noted in its fourth request for extension in which to respond that this case involves a "significant constitutional issue" and the State has graciously consented to "whatever time" Appellant needs in which to properly reply. Additionally, the undersigned currently has a very heavy case load. The undersigned is working on the Reply Brief in this case and hopes to have it completed in a timely manner. Appellant would therefore request an extension of time within which to serve and file the Reply Brief and request that the time for filing be held in abeyance pending a ruling on this motion.

**WHEREFORE**, Appellant prays that the Court extend the deadline for the service and filing of the Reply Brief of Appellant in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,



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June 26, 2014

Attorneys for Appellant

IN THE SOUTH CAROLINA COURT OF APPEALS

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Appellant Case No. 2012-213141

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The State, Respondent

v.

Alphonso Chaves Thompson, Appellant.

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**PROOF OF SERVICE FOR MOTION FOR SECOND EXTENSION WITHIN  
WHICH TO SERVE AND FILE APPELLANT'S REPLY BRIEF**

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I, Laura Thomason, hereby certify that I have served a copy of the PROOF OF SERVICE FOR MOTION FOR SECOND EXTENSION WITHIN WHICH TO SERVE AND FILE APPELLANT'S REPLY BRIEF upon counsel for the other parties by mailing copies to them at the address below via the United States Mail this 26<sup>th</sup> day of June, 2014.

Mary S. Williams, Esquire  
Assistant Attorney General  
Office of the Attorney General  
PO Box 11549  
Columbia, SC 29211

  
\_\_\_\_\_  
Laura Thomason

**RECEIVED**

JUN 26 2014

**SC Court of Appeals**

**Michael P. Scott**  
Associate  
Admitted in SC

June 26, 2014

**BY HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

***Re: The State v. Alphonso Chaves Thompson  
Case Tracking # 2012-213141***

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Motion for Second Extension Within Which to Serve and File Appellant’s Reply Brief, along with the Proof of Service, in the above-referenced matter. I would appreciate your filing the original and six (6) copies and return a filed stamped copy to me via our courier.

By copy of this letter and as evidenced by the attached Proof of Service, we are serving Appellant and counsel of record with a copy of the same.

Very truly yours,



Michael P. Scott

MPS/ksh

Enclosures

cc: Robert M. Dudek, Esquire  
Mary S. Williams, Esquire  
Alphonso Chaves Thompson

**Charleston**

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

Myrtle Beach

Raleigh