

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

DeAndrea G. Benjamin, Circuit Court Judge

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Case Nos. 2012GS1040032 and 2012GS1040033

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The State, ..... Respondent,

v.

Brett D. Parker, ..... Appellant.

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**MOTION FOR EXTENSION**

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Pursuant to Rule 240, SCACR, Appellant requests a 30-day extension of the deadline for filing and serving his initial brief and designation of matter to be included in the record on appeal. The current deadline is July 28, 2014. This is Appellant's second request for an extension of this deadline.

Previously, the Court ruled that no further extensions would be granted absent extraordinary circumstances. Appellant offers the following as extraordinary circumstances that justify this request:

1. The record on appeal in this matter is 3,200 pages long, requiring an extraordinary amount of time to review.
2. Counsel for Appellant is currently serving as special counsel to the South Carolina House Ethics Committee, and those duties consumed inordinate amounts of time in recent weeks as to certain matters in which the Committee has an interest;

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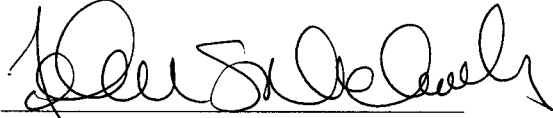
JUL 28 2014

**SC Court of Appeals**

3. Counsel for Appellants is representing the Florence County Elections Commission in the Supreme Court's original jurisdiction and had a response that was due Monday, July 14, 2014;
4. Counsel for Appellant is also counsel in an appeal in a child adoption matter before this Court that was expedited for briefing (counsel received opponent's respondent's brief on Monday, July 7, 2014, and filed the reply brief on Monday, July 14) and oral argument on July 23, 2014;
5. Counsel for Appellant is a member of the South Carolina Board of Law Examiners, which was preparing questions and answers for the July 2014 Bar Exam during the last month;
6. Counsel for Appellant is defense counsel in a matter before the Bamberg County Court of Common Pleas, which set an unexpected expedited hearing on Motions for 10:00 a.m. on Thursday, July 10, 2014;
7. Counsel for Appellant is assisting three (3) lawyers regarding complaints before the Office of Disciplinary Counsel and has been preparing materials to file responses in each matter.

Appellant's Counsel has been working diligently to complete the initial brief and designation, and respectfully requests an additional 30 days to finalize the documents.

Respectfully submitted,



John S. Nichols, SC Bar No. 4210  
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THOMPSON & DELGADO  
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(803) 779-7599  
(803) 779-8995 (facsimile)  
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July 28, 2014

Attorney for Appellant

THE STATE OF SOUTH CAROLINA  
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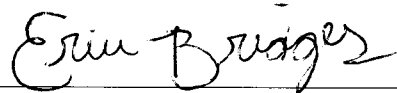
**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served counsel for the Respondent with a copy of the *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Alan M. Wilson, Esquire  
Donald J. Zelenka, Esquire  
S.C. Attorney General's Office  
P.O. Box 11549  
Columbia, SC 29211-1549

July 28, 2014



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Erin Bridges  
BLUESTIEN, NICHOLS, THOMPSON,  
DELGADO, LLC

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**SC Court of Appeals**



Margaret Miles Bluestein  
John Shannon Nichols  
Stacy Elizabeth Thompson  
John Dennis Delgado  
Allison Paige Sullivan  
Ashley Trout Thompson  
Blake Alexander Hewitt  
Kenneth Henry Dojaquez  
John Clarke Newton

O. Eugene Powell, Jr.

July 28, 2014

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**VIA HAND DELIVERY**

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

RE: The State v. Brett D. Parker  
Case Tracking No.: 2013-001238

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have also enclosed a proof of service of this document on counsel for the Respondent. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges  
Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS, THOMPSON &  
DELGADO, LLC

/emb

Enclosures

cc: Ernest L. Dessausure, Esquire  
Alan M. Wilson, Esquire  
Donald J. Zelenka, Esquire