

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of General Sessions

DeAndrea G. Benjamin, Circuit Court Judge

Case Nos. 2012GS1040032 and 2012GS1040033

The State, Respondent,

v.

Brett D. Parker, Appellant.

MOTION FOR EXTENSION

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 August 27, 2014. This is Appellant's third 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. Appellant's counsel underestimated the time it has taken to adequately review the record.
2. Counsel for Appellant is currently serving as special counsel to the South Carolina House Ethics Committee, and those duties have consumed inordinate amounts of

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time in recent weeks as to certain matters in which the Committee has an interest;

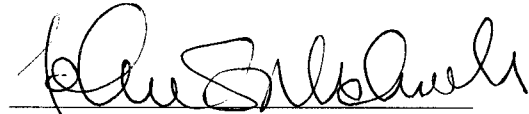
3. Counsel for Appellant is representing the Florence County Elections Commission in the Supreme Court's original jurisdiction which has now concluded in that Court, but an underlying action involving a related election to be held on September 2, 2014 continues to demand immediate attention of counsel;
4. Counsel for Appellant is also counsel in an expedited appeal in a child adoption matter that is now before the Supreme Court and oral argument is set for September 23, 2014;
5. Counsel for Appellant is a member of the South Carolina Board of Law Examiners, which is currently grading responses to the July 2014 Bar Exam (there were nearly 500 applicants who took the exam);
6. 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.

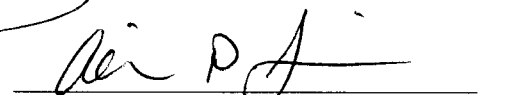
Appellant's Counsel consulted with counsel for the State, who has no objection to this request.

Pursuant to the Supreme Court's administrative order of March 18, 2009, this motion is being signed by two lawyers who certify that they believe that the extension is warranted and that there is good cause to seek the extension.

Respectfully submitted,



John S. Nichols, SC Bar No. 4210



Allison P. Sullivan, SC Bar No. 73754
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Attorneys for Appellant

August 28, 2014

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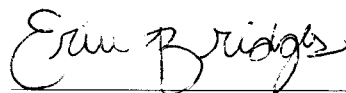
Brett D. Parker, Appellant.

PROOF OF SERVICE

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

August 28, 2014



Erin Bridges
BLUESTIEN, NICHOLS, THOMPSON,
DELGADO, LLC

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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.

August 28, 2014

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

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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