

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM GEORGETOWN COUNTY  
Court of General Sessions  
Edward B. Cottingham, Circuit Court Judge

Case No. 2011-GS-22-01298

The State, .....Respondent,

v.

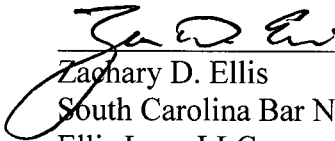
Franklin E. Dennison, .....Appellant.

MOTION FOR EXTENSION OF TIME WITHIN  
WHICH TO FILE INITIAL BRIEF

Appellant moves, pursuant to Rule 240 of the South Carolina Rules of Appellate Procedure, for a third extension of time within which to file his initial brief in the above-captioned case. Currently, Appellant's initial brief is due September 5, 2014. Appellant bases his motion on the following grounds:

- (1) The undersigned, inter alia, has had an intensive litigation schedule.
- (2) The undersigned and his law partner recently dissolved their law practice, and the undersigned established a new solo practice.
- (2) The undersigned has consulted with Angela Bennett of the South Carolina Attorney General's Office regarding this request for an extension of time, and she has consented to it.

For these reasons, Appellant respectfully requests this Court extend the deadline for filing and serving his initial brief until October 5, 2014. Appellant further requests that the current deadline be stayed during the pendency of this motion.

  
\_\_\_\_\_  
Zachary D. Ellis  
South Carolina Bar No. 71919  
Ellis Law, LLC  
111-A E. North Street  
Greenville, South Carolina 29601  
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Attorney for Appellant

**PROOF OF SERVICE OF MOTION FOR EXTENSION**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY  
Court of General Sessions

Edward B. Cottingham, Circuit Court Judge

Case No. 2011-GS-22-01298

The State,

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v.

Franklin E. Dennison,

Appellant.

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PROOF OF SERVICE

I certify that I have served the Motion for Extension Of Time Within Which To File Initial Brief on the South Carolina Attorney General's Office by depositing a copy of it in the United States Mail, postage prepaid, on September 4, 2014, addressed to Post Office Box 11549, Columbia, South Carolina 29211.

September 4, 2014



Zachary D. Ellis  
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Attorney for Appellant

# ELLISLAW<sub>LLC</sub>

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September 4, 2014

South Carolina Court of Appeals  
Attn: Jenny Kitchings  
1205 Pendleton Street  
Columbia, South Carolina 29201

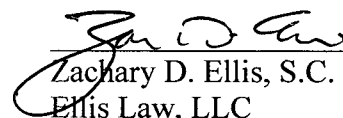
Re: The State v. Franklin E. Dennison  
Appellate Case No. 2013-002179  
Motion for Extension of Time Within Which to File Initial Brief

To Whom It May Concern:

Please find enclosed a proposed Motion for Extension of Time Within Which to File Initial Brief as well as a Proof of Service of Motion for Extension in the above mentioned case.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

  
\_\_\_\_\_  
Zachary D. Ellis, S.C. Bar # 71919  
Ellis Law, LLC  
Attorney for Appellant

Enc.: Motion for Extension of Time (original plus six copies); Proof of Service  
cc: South Carolina Attorney General's Office (via U.S. Mail)

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**SC Court of Appeals**

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