

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Florence County
The Honorable D. Craig Brown, Circuit Court Judge
Appellate Case No. 2013-001445

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SEP 17 2014

THE STATE OF SOUTH CAROLINA,

SC Court of Appeals
RESPONDENT,

v.

WILLIAM JAMELL THOMAS, JR.,

APPELLANT.

**MOTION FOR FIFTEEN-DAY EXTENSION OF TIME
IN WHICH TO FILE THE INITIAL BRIEF OF RESPONDENT**

The Initial Brief of Respondent and Designation of Matter in the above-captioned matter are due to be served and filed today, September 17, 2014. Two previous extension requests have been granted. The charges involved in this case are attempted murder and possession of a pistol by a person with a prior conviction for a crime of violence. The trial transcript is approximately six-hundred and thirty pages in length and Appellant has raised three issues.

On September 5, 2014, I submitted the Initial Brief of Respondent in the matter of State v. Stepheno Jemain Alston. On September 9, 2014, I appeared before this Court to argue the case of State v. James Harris. On September 10, 2014, I appeared before this Court to argue the case of Jeremiah Dicapua v. State. On September 11, 2014, I appeared before this Court to argue the case of State v. Keeon Butler. In the days following

following these oral arguments, I have been working to complete the Return to Petition for Writ of Certiorari in the case of State v. Alton Wesley Gore, which is due today in the South Carolina Supreme Court.

In light of the foregoing, I am respectfully requesting that this Court grant me an additional fifteen (15) days to complete the Initial Brief of Respondent in this case. I have communicated with opposing counsel, Elizabeth A. Franklin-Best, and she consents to this extension request.

WHEREFORE, Respondent hereby respectfully requests an extension of fifteen (15) days in which to file and serve its Initial Brief of Respondent and Designation of Matter.

Respectfully submitted,

ALAN WILSON
Attorney General

SALLEY W. ELLIOTT
Senior Assistant Deputy Attorney General


SALLEY W. ELLIOTT

CHRISTINA CATOE BIGELOW
Assistant Attorney General


CHRISTINA CATOE BIGELOW

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ATTORNEYS FOR RESPONDENT

September 17, 2014

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Florence County
The Honorable D. Craig Brown, Circuit Court Judge
Appellate Case No. 2013-001445

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

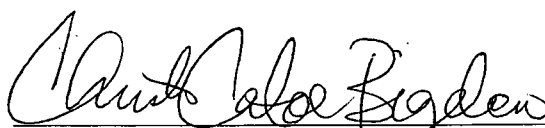
v.

WILLIAM JAMELL THOMAS, JR.,

APPELLANT.

PROOF OF SERVICE

The undersigned attorney hereby certifies that the **Motion for Extension of Time** in the above-referenced case has been served upon **Elizabeth A. Franklin-Best**, Blume Norris & Franklin-Best, 900 Elmwood Avenue, Suite 101, Columbia, South Carolina 29201, this 17th day of **September, 2014**.



CHRISTINA CATOE BIGELOW

Assistant Attorney General

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SC Court of Appeals



ALAN WILSON
ATTORNEY GENERAL

September 17, 2014

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

RE: State of South Carolina v. William Jamell Thomas, Jr.
Appellate Case No. 2013-001445

Dear Ms. Kitchings:

Enclosed please find the State's **Motion for Extension of Time**, along with **Proof of Service**, in the above-referenced appeal.

Thank you for your attention to this matter, and please do not hesitate to contact me at (803) 734-3713 should there be any questions or concerns.

Sincerely,

Christina Catoe Bigelow
Assistant Attorney General
S.C. Bar No. 73562

CCB/

cc: Elizabeth A. Franklin-Best, Esquire
Blume Norris & Franklin-Best
900 Elmwood Avenue, Suite 101
Columbia, SC 29201

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