

The State of South Carolina

Supreme Court

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS - Sixteenth Judicial Circuit
2012-CP-46-03762

Devon Miles Brown,

Applicant,

v.

State of South Carolina,

Respondent.

2014 - 000403⁸⁰²

RECEIVED

OCT 10 2014

S.C. SUPREME COURT

MOTION FOR 30-DAY EXTENSION OF TIME TO SERVE AND FILE
PCR APPLICANT'S PETITION FOR WRIT OF CERTIORARI & APPENDIX

October 10, 2014

Yours, etc.,

Dale Lionel Smith

DALE LIONEL SMITH, ESQ.
483 Broadway, Suite 502
New York, New York 10013
(212) 219-1000 - telephone
(212) 219-1002 - facsimile

Attorney for Devon Miles Brown

To: Rutledge Johnson
Assistant Deputy Attorney General
Office of the Attorney General
1000 Assembly Street, Room 519
Columbia, South Carolina 29201
Attorney for Respondent
(803) 734-1867

1. DALE LIONEL SMITH, ESQ., an attorney admitted *pro hac vice* to practice law before this Honorable Court, on behalf of PCR Applicant Devon Miles Brown, moves for an order granting a 30-day extension of time to file Mr. Brown's Petition for Writ of Certiorari and Appendix.

2. Mr. Brown is required to file his Petition & Appendix on or before October 10, 2014, and he has neither requested nor obtained a previous extension of time.

3. Counsel is unable to complete the Petition and Appendix within the time required and therefore must move this Court for a 30-day extension of time.

4. The motion is not meant to prejudice the parties, inconvenience the Court or delay the proceedings and there is no prejudice to the parties.

WHEREFORE, Mr. Brown prays that this Court enters an Order granting him a 30-day extension of time to serve and file his Petition and Appendix to November 9, 2014.

Dated: October 10, 2014

Respectfully submitted,



DALE LIONEL SMITH, ESQ.
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Attorney for Devon Miles Brown

The State of South Carolina

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♦♦♦♦♦

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State of South Carolina,

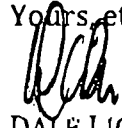
Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for an Extension of Time to Serve & File Applicant's Petition for Writ of Certiorari and Appendix on the following person and entity by delivering a copy for to the USPS for overnight delivery to: Rutledge Johnson, Assistant Deputy Attorney General, P.O. Box 11549, 1000 Assembly Street, Room 519, Columbia, South Carolina 29201 on October 10, 2014.

October 10, 2014

Yours, etc.,



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Attorney for Devon Miles Brown
