

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM RICHLAND COUNTY
The Honorable Maite D. Murphy, Circuit Court Judge

Appellate Case No. 2013-002124

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THE STATE OF SOUTH CAROLINA,

APPELLANT, *S.C. Supreme Court*

V.

SHANNON SCOTT,

RESPONDENT.

**MOTION TO PERMIT APPELLANT TO FILE
AMENDED INITIAL BRIEF OF APPELLANT**

Comes now Appellant, above named, and through undersigned counsel would respectfully request this Court allow Appellant to file an Amended Initial Brief of Appellant.

In preparing the Final Brief of Appellant, undersigned counsel learned of a typographical error in the Statement of Issues on Appeal. Specifically, the second statement contained bracketed language that undersigned counsel had intended to delete before filing the Initial Brief. Out of an abundance of caution, undersigned counsel requests permission to file an amended Initial Brief that only makes the

following change: Statement of Issues on Appeal – No. 2. - the wording was removed “[give reason here].” and a “?” was inserted in its place.

Undersigned counsel for Appellant has been in contact with counsel for Respondent, and counsel for Respondent consents to the amendment of the Initial Brief from counsel for the Respondent.

Wherefore, premises considered, Appellant respectfully moves for permission to file an Amended Initial Brief of Appellant. Appellant further moves for permission to file its Final Brief of Appellant based upon the Amended Initial Brief of Appellant. If this Court disallows Appellant to amend the Initial Brief of Appellant, Appellant would respectfully request a brief extension in which to file the Final Brief of Appellant.

Respectfully submitted,

ALAN WILSON
Attorney General

JOHN W. McINTOSH
Chief Deputy Attorney General

DONALD J. ZELENKA
Senior Assistant Deputy Attorney General

ALPHONSO SIMON, JR.
Assistant Attorney General
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Columbia, South Carolina 29211
(803) 734-6305

November 10, 2014.

By: 

Alphonso Simon, Jr.
ATTORNEYS FOR APPELLANT

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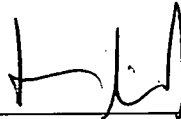
RESPONDENT.

CERTIFICATE OF SERVICE

I, Alphonso Simon, Jr., counsel for the Appellant, certify that I have served the within Motion to Permit Appellant to File Amended Initial Brief, together with the Amended Initial Brief of Appellant on Respondent by depositing two (2) copies of the same in the United States mail, postage prepaid, addressed to his attorney of record, Robert M. Dudek, Esq., SCCID/Division of Appellate Defense, 1330 Lady Street, Ste. #401, Columbia, South Carolina 29201.

I further certify that all parties required by Rule to be served have been served.

This 10th day of November, 2014.



ALPHONSO SIMON, JR.

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ATTORNEYS FOR APPELLANT