

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Certiorari to Richland County

R. Knox McMahon, Circuit Court Judge

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NOV 14 2014

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

ZINAH DAMARIS JENNINGS,

APPELLANT

Appellate Case No. 2012-212947

PETITION FOR EXTENSION TO FILE THE RECORD ON APPEAL

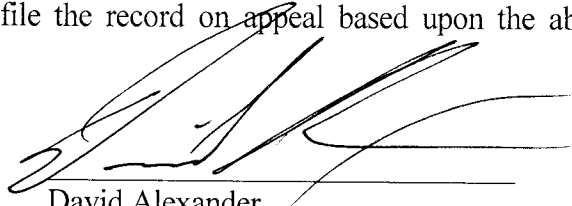
Counsel for Zinah Jennings petitions the Court to allow a **twenty (20) day extension** of time to file and serve the record on appeal in this case. In support of this petition counsel shows:

1. The initial brief of appellant and designation of matter were filed on May 1, 2014. The initial brief of respondent was filed on October 17, 2014. The record on appeal is due to be filed on **November 17, 2014**.
2. The record in this case **will exceed 1,800 pages**. It is difficult to redact because the allegations concern a child.
3. Due to my assistant's heavy workload and the length and complexity of this record, she will not be able to complete the record for my review by November 17, 2014.

4. **Additionally, counsel will have in-patient surgery on November 20, 2014, and will miss several days of work.** Combined with the Thanksgiving holiday, reviewing and filing the completed record without an extension will be impossible.

4. Counsel for the Attorney General's office graciously consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel respectfully requests that the Court grant counsel's request to extend the time to file the record on appeal based upon the above circumstances.

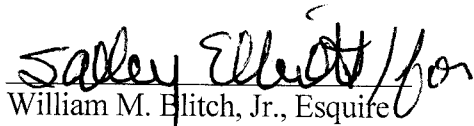


David Alexander
Appellate Defender

ATTORNEY FOR APPELLANT

November 14th, 2014

I Consent:



William M. Blitch, Jr., Esquire

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CERTIFICATE OF SERVICE

I certify that a true copy of the Motion for an Extension of Time to File the Record on Appeal in the above referenced case has been served upon William M. Blich, Jr., Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 14th day of November, 2014.



David Alexander
Appellate Defender

SUBSCRIBED AND SWORN TO before me
this 14th day of November, 2014.

 (L.S.)

Notary Public for South Carolina
My Commission Expires: July 3, 2023.