

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

The Honorable Robert E. Hood, Circuit Court Judge

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Appellate Case No. 2012-001203  
General Sessions Case Nos. 2013-GS-40-06520 & 2013-GS-40-06521

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**RECEIVED**

NOV 13 2014

**SC Court of Appeals**

M4144

The State of South Carolina,..... Respondent,

v.

Robert Antonio Guinyard, ..... Appellant.

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**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

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Pursuant to Rules 263(b) and 240, SCACR, the undersigned counsel for Appellant respectfully requests a thirty (30) day extension of the deadline for filing Appellant's Initial Brief, which is currently due December 8, 2014. With the extension, the new deadline would be January 7, 2015. The grounds for this request are that the undersigned is appointed counsel as part of the 2014 Appellate Practice Project, the trial transcript is over 1,800 pages long, and, given the other demands of his practice, the undersigned needs additional time to properly review the record and prepare Appellant's Initial Brief. The undersigned has consulted with Salley W. Elliott, Esquire, counsel for Respondent, who indicated she has no objection to this request.

*Matthew G. Gerrald*

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Attorneys for Appellant

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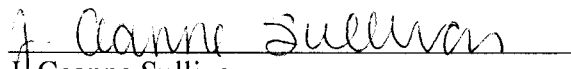
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**PROOF OF SERVICE**

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I, the undersigned employee of Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on November 12, 2014, served a copy of the enclosed **MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** upon all other parties, through their attorney(s) of record, by depositing copies of the documents in the United States Mail, first class, sufficient postage prepaid, with the return address(es) clearly noted, addressed as follows:

Salley W. Elliott, Esquire  
S.C. Attorney General's Office  
Post Office Box 11549  
Columbia, SC 29211

  
J. Ceanne Sullivan  
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WELDON R. JOHNSON \*  
DAVID G. WOLFF  
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EMILY COLLINS BROWN  
CATHERINE AVA KOPIEC  
JENNIFER I. WAXMAN



# BARNES ALFORD

**Barnes Alford Stork & Johnson L.L.P.**

ATTORNEYS AT LAW

*OF COUNSEL*  
WILLIAM C. STORK  
ROGER A. WAY, JR.

\* CERTIFIED CIVIL  
COURT MEDIATOR

† CERTIFIED SPECIALIST  
IN TAXATION

RUDOLPH C. BARNES  
(1917-1995)  
JAMES W. ALFORD  
(1930-2008)

November 12, 2014

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, SC 29211

Re: State v. Guinyard  
Appellate Case No. 2012-001203  
BASJ File No. 528.20188

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Motion for Extension of Time to File Initial Brief in this matter. Also enclosed is a check in the amount of \$25.00 to cover the filing fee. Please file the original and six (6) copies of the motion and return one (1) clocked copy in the envelope provided for your convenience.

By copy of this letter, I am serving counsel for Respondent with a copy of the motion. Thank you for your assistance in this matter.

With kindest regards, I remain

Very truly yours,

A handwritten signature in black ink that reads "Matthew G. Gerrald". The signature is written in a cursive style.

Matthew G. Gerrald

MGG/jcs  
Enclosures

cc: Salley W. Elliott, Esquire  
Robert M. Dudek, Esquire

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**SC Court of Appeals**

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**SC Court of Appeals**

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