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STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

CASE NUMBER: 2014-001391

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DEC 01 2014

SC Court of Appeals

Appeal From Florence County  
Honorable D. Craig Brown, Circuit Court Judge

THE STATE,

RESPONDENT

vs.

DAMON E. MOODY,

APPELLANT

**MOTION FOR EXTENSION OF TIME TO FILE APPELLATE BRIEF TO BE INCLUDED IN THE RECORD OF APPEAL**

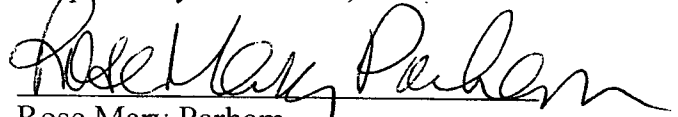
This Motion comes before the Court pursuant to Rules 262 and 263(b) of the South Carolina Rules of Court for an extension to submit the above referenced filings for review. The Appellant, by and through his attorney, Rose Mary Parham, hereby requests a 30-day extension to file his appellate brief. This will allow the Appellant to file all documents necessary to complete the file at the same time.

This motion is based on the following facts. Appellant's attorney received completed transcripts and trial exhibits on October 30, 2014. This has inevitably delayed the attorney's ability to properly draft the Appellant's brief in a timely manner. In addition, Appellant's attorney was lead counsel in a federal jury trial in the case of *United States vs. John Dong* from November 3, 2014, through November 14, 2014. Combining the backlog of the attorney's caseload with the recent trial, there are exigent circumstances surrounding the case in terms of preparation of the brief.

The undersigned has spoken with Senior Assistant Deputy Attorney General Salley W. Elliott, and she consents to the requested extension of time.

It is therefore requested of this Honorable Court that an extension to file this information be ordered.

Respectfully Submitted,



Rose Mary Parham  
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Bar Number 17032

**Attorney for Appellant**

# P A R H A M

PARHAM LAW FIRM, LLC

November 26, 2014

VIA U.S. MAIL

Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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SC Court of Appeals

RE: The State, Respondent, v.  
Damon E. Moody, Appellant.

Appellate Case No. 2014-001391

Dear Clerk of Court:

Enclosed please find the original and (7) seven copies of Appellant's Motion for Extension of Time to File Appellate Brief to be Included in the Record of Appeal which is being forwarded to you for filing. I would ask that you file the originals and send one clocked copy back to me in the envelope I have provided.

By copy of this letter, I am serving Salley W. Elliott, Esq., counsel for the Respondent, with a copy of the same.

Should you have any questions or comments, please do not hesitate to contact me.

Very truly yours,

*Rose Mary Parham*  
Rose Mary Parham  
Attorney for Appellant  
Damon Ellis Moody  
SC Bar No.: 17032

RMP/lm

Enclosures

cc: Salley W. Elliott, Esq.  
Attorney for the Respondent

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