
The State of South Carolina

Supreme Court

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

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S.C. SUPREME COURT

Devon Miles Brown,

Applicant,

v.

2014 - 000802

State of South Carolina,

Respondent.

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

December 9, 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 Wednesday, December 10, 2014, and has requested two extensions of time.

3. Counsel is unable to complete the Petition and Appendix within the time required because he is preparing a Petition for Certiorari before the United States Supreme Court, which must be filed no later than December 29, 2014. Counsel is a sole practitioner and because of his professional and personal commitments must respectfully request an extension of time. I have conferred with the assigned Assistant Deputy Attorney General Mr. Rutledge Johnson and he has no objection to this motion for an 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 January 9, 2015.

Dated: December 9, 2014

Respectfully submitted,


DALE LIONEL SMITH, ESQ.
483 Broadway, Suite 502
New York, New York 10013
(212) 219-1000 - telephone
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Attorney for Devon Miles Brown

The State of South Carolina

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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 to the USPS for delivery to: Rutledge Johnson, Assistant Deputy Attorney General, P.O. Box 11549, 1000 Assembly Street, Room 519, Columbia, South Carolina 29201 on December 9, 2014.

December 9, 2014

Yours, etc.,



DALE LIONEL SMITH, ESQ.
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(212) 219-1002 - facsimile

Attorney for Devon Miles Brown
