

**J. FALKNER WILKES**  
Attorney at Law

114 Whitsett Street  
Greenville, South Carolina 29601



December 19, 2014

Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
via facsimile also to: (803) 734-1893

**RECEIVED**

DEC 22 2014

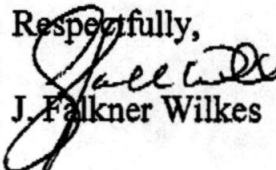
**SC Court of Appeals**

Re: State v. Marcus Dwain Wright,  
2012-GS-26-2551; 2552; 2553; 2339

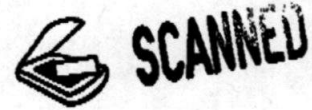
Dear Ms. Kitchings,

I represent Marcus Wright in the appeal of his case. I am responding to your letter of December 17, 2014. My records show I filed a letter request for an extension in which to file the Appellant's Reply Brief. I subsequently had to file a motion for additional time. Due to the size of the Respondent's brief, an overwhelming work load, and the holidays, I have been unable to complete the Reply Brief. I am enclosing copies of my earlier requests. It is my understanding that the time for filing the Record on Appeal would not begin to run until the Reply Brief was served. Please let me know if this is incorrect and what, if any, corrective measures I must take.

I will be out of the office from December 22<sup>nd</sup> until January 5<sup>th</sup> but will take whatever measures necessary immediately upon my return.

Respectfully,  
  
J. Falkner Wilkes

c.  
Anthony Mabry, Assistant Atty. Gen.  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211  
via facsimile also to: (803) 253-6283



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11626  
COLUMBIA, SOUTH CAROLINA 29211  
1015 SUMTER STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
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December 17, 2014

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Mr. J. Falkner Wilkes, Esquire  
114 Whitsett St.  
Greenville SC 29601

Re: The State v. Marcus Dwain Wright  
Appellate Case No. 2013-001406

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**SC Court of Appeals**

Dear Counsel:

According to our records, the proof of service of the Record on Appeal was due to be served upon this Court no later than December 3, 2014. Please advise the Court of the status of the Record on Appeal within ten (10) days of the date of this letter.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Alan McCrory Wilson, Esquire  
Donald J. Zelenka, Esquire  
J. Anthony Mabry, Esquire

**J. FALKNER WILKES**

*Attorney at Law*

114 Whitsett Street  
Greenville, South Carolina 29601

Telephone: (864) 282-1292  
Facsimile: (864) 271-6035

November 12, 2014

Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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DEC 22 2014

**SC Court of Appeals**

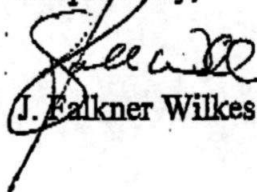
Re: State v. Marcus Dwain Wright,  
2012-GS-26-2551; 2552; 2553; 2339

Dear Ms. Kitchings,

I represent Marcus Wright in the appeal of his case. I show the time for filing the Appellant's reply brief to be November 13<sup>th</sup>. The Respondent has re-filed its Respondent's Brief which is now 65 pages in length. Due to the length of the brief and number of issues I will need additional time to prepare and serve the Appellant's Reply Brief.

I am hereby requesting an extension of thirty days from the present deadline in which to serve and file the Appellant's Reply Brief.

Respectfully,

  
J. Falkner Wilkes

c.  
Anthony Mabry, Assistant Atty. Gen.  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

Marcus Wright, 289646  
Broad River Correctional Institution  
4460 Broad River Road  
Columbia, SC 29210

**J. FALKNER WILKES***Attorney at Law*

.114 Whitsett Street  
Greenville, South Carolina 29601

Telephone: (864) 282-1292  
Facsimile: (864) 271-6035

December 15, 2014

Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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DEC 22 2014

**SC Court of Appeals**

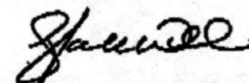
Re: State v. Marcus Dwain Wright,  
2012-GS-26-2551; 2552; 2553; 2339

Dear Ms. Kitchings,

I represent Marcus Wright in the appeal of his case. I show the time for filing the Appellant's reply brief to be December 15<sup>th</sup>. Due to my present caseload, the length of the Respondent's Brief, number of issues involved and the huge record in this case, I am in need of additional time to complete the Reply in this case.

I am hereby enclosing a motion requesting an extension of thirty days from the present deadline in which to serve and file the Appellant's Reply Brief. This will allow me to complete the brief during the slow down in the holidays.

Respectfully,



J. Falkner Wilkes.

c.  
Anthony Mabry, Assistant Atty. Gen.  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

Marcus Wright, 289646  
Broad River Correctional Institution  
4460 Broad River Road  
Columbia, SC 29210

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of General Sessions

John C. Hayes, Circuit Court Judge

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DEC 22 2014

**SC Court of Appeals**

Case No.: 2012-GS-26-2551; 2012-GS-26-2552; 2012-GS-26-2553; 2012-GS-26-2339

The State, ..... Respondent,

vs.

Marcus Dwain Wright, ..... Appellant.

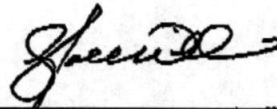
Motion

Appellant moves for an extension of thirty days to file and serve the Reply of the Appellant. Due to present caseload in both appellate and trial matters, combined with other client related obligations, the undersigned requires additional time to file and serve the Reply of the Appellant in order to fully brief the numerous issues raised by the Respondent's extensive brief.

I certify that the request in this case is necessitated by workload, the number of issues involved, the size of the record and is based on good cause without the intent to cause undue delay.

Wherefore, Appellant moves the Court to grant an additional thirty days in which to complete, serve and file the Reply in this case.

Respectfully submitted,



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J. Falkner Wilkes, 12893  
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jfalknerwilkes@gmail.com

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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DEC 22 2014

APPEAL FROM Horry COUNTY  
Court of General Sessions

SC Court of Appeals

John C. Hayes, Circuit Court Judge

Case No.: 2012-GS-26-2551; 2012-GS-26-2552; 2012-GS-26-2553; 2012-GS-26-2339

The State, ..... Respondent,

vs.

Marcus Dwain Wright, ..... Appellant.

Certificate of Service

I certify that on the 15th day of December, 2014, I served the Appellant's Motion for an extension of time on the Respondent by placing a copy of same in the United States Mail, first class postage prepaid, addressed to counsel for the Respondent and others as indicated below:

Anthony Mabry, Asst. Atty. Gen.  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

  
\_\_\_\_\_  
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Greenville, SC 29601  
(864) 282-1292  
(864) 271-6035 facsimile  
jfalknerwilkes@gmail.com

December 15, 2014.