

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of General Sessions

The Honorable Robert E. Hood, Circuit Court Judge

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

RECEIVED
DEC 29 2014
SC Court of Appeals

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

v.

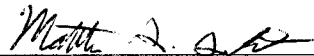
Robert Antonio Guinyard,..... Appellant.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Pursuant to Rules 263(b) and 240, SCACR, and Supreme Court Order No. 2009-03-18-01, 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 January 7, 2015. With the extension, the new deadline would be February 6, 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 and the recently concluded holiday season, the undersigned needs additional time to finish reviewing the record and preparing Appellant’s Initial Brief.

The undersigned states that he does not anticipate seeking any further extensions. He and his partner, Richard C. Thomas, certify that they believe that the requested extension is warranted and that there is good cause to seek the extension.

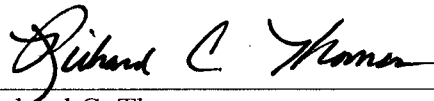
The undersigned has attempted to consult with Salley W. Elliott, Esquire, counsel for Respondent, but was unable to reach her prior to filing this motion. However, the undersigned is informed and believes, based on prior communications with Ms. Elliott, that she would not object to the motion.



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

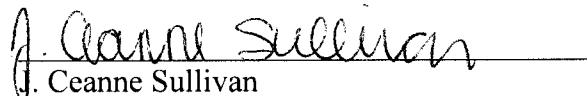
v.

Robert Antonio Guinyard,..... Appellant.

PROOF OF SERVICE

I, the undersigned employee of Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on December 29, 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
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JAMES W. ALFORD
(1930-2008)

December 29, 2014

VIA HAND DELIVERY

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

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SC Court of Appeals

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. Please file the original and six (6) copies of the motion and return one (1) clocked copy with our courier. I understand there is no filing fee because this is a criminal matter.

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,

Matthew G. Gerrald

MGG/jcs
Enclosures

cc: Salley W. Elliott, Esquire (*via regular mail*)
Robert M. Dudek, Esquire (*via regular mail*)

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