

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

JAN 08 2015

Appeal from Darlington County

SC Court of Appeals

Honorable R. Ferrell Cothran, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JAMECO ABDUL TONEY,

APPELLANT

APPELLATE CASE NO. 2013-002534

PETITION FOR SECOND EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

The undersigned counsel respectfully requests a second thirty day extension, in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

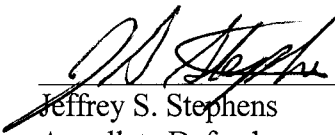
1. The initial brief of appellant and designation of matter in this case are due to be served and filed on January 7, 2014.
2. Counsel is a private attorney with a significant caseload that affects his ability to complete the initial brief in the subject case. Additionally, in his capacity as a reserve Marine Corps Judge Advocate, Counsel is a reserve appellate defense counsel, has filed three supplements to petition for review with the Court of Appeals for the Armed Forces in December

of 2014 and has reviewed three records of trial amounting to over 2,000 pages of court transcripts for the filing of briefs due during the month of January 2015.

3. This request is made in good faith, not for purposes of delay, and no further requests for extensions of time are anticipated by counsel.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Jeffrey S. Stephens
Appellate Defender

January 6, 2015

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

JAN 08 2015

Appeal from Darlington County
Honorable R. Ferrell Cothran, Circuit Court Judge

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

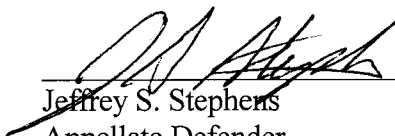
JAMECO ABDUL TONEY,

APPELLANT

APPELLATE CASE NO. 2013-002534

CERTIFICATE OF SERVICE

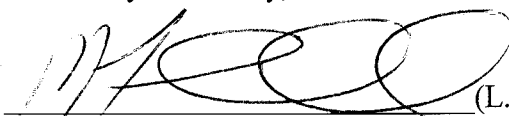
The undersigned attorney hereby certifies that a true copy of the petition for second extension to file the initial brief of appellant and designation of matter in the above referenced case has been served upon Salley W. Elliott, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 6th day of January, 2015.



Jeffrey S. Stephens
Appellate Defender

ATTORNEY FOR APPELLANT

SUBSCRIBED AND SWORN TO before me
this 6th day of January, 2015.



(L.S.)
Notary Public for South Carolina
My Commission Expires: 26 Apr 16.



Quindlen Law Firm

POST OFFICE BOX 2450 • BEAUFORT, SOUTH CAROLINA 29901-2450
(843) 379-2660 TELEPHONE (843) 379-2664 FACSIMILE
WWW.QUINDLENLAW.COM

Mary Fran Quindlen
info@quindlenlaw.com

Jeffrey S. Stephens**
jeff@quindlenlaw.com

Catherine Webb*
catherine@quindlenlaw.com

*also licensed in Connecticut
**also licensed in Florida

January 6, 2015

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

***Re: PETITION FOR SECOND EXTENSION ICO, STATE V. TONEY,
APPELLATE CASE NUMBER 2013-002534***

Dear Ms. Kitchings:

Enclosed please find the original and a copy each of the Petition for Second Extension and Proof of Service of the same. Please file the original of each and return a clocked copy in the enclosed, self-addressed stamped envelope.

With kind regards, I am

Sincerely,

QUINDLEN LAW FIRM, P.A.


Jeffrey S. Stephens

Enclosures

Cc: Salley Elliott, Esq.
Robert M. Dudek, Esq.

RECEIVED

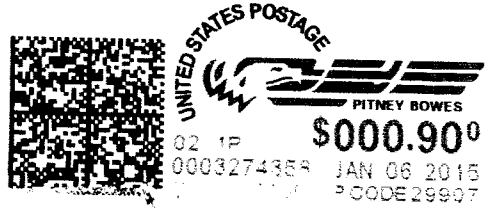
JAN 08 2015

SC Court of Appeals

RECEIVED

JAN 08 2015

SC Court of Appeals



Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

