

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

Case No. 2011-GS-46-01851
Appellate Case No. 2013-001953

RECEIVED

JAN 30 2015

SC Court of Appeals

The State Respondent,

v.

Julia B. Phillips Appellant.

**THIRD MOTION FOR EXTENSION TO FILE INITIAL BRIEF OF
APPELLANT**

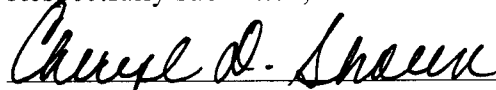
Pursuant to Rule 240, SCACR, Appellant Julia B. Phillips respectfully requests a 30-day extension to file her Initial Brief and Designation of Matter, currently due to be filed and served on February 6, 2015. This motion is made on two grounds. First, the undersigned currently has a very heavy workload, including other pro bono matters. Second, the undersigned is recently in receipt of additional transcript pages in this matter that directly affect the preparation of Appellant's Initial Brief. Therefore, additional time is needed to prepare and file the Initial Brief and Designation of Matter. This is Appellant's third request for an extension to file her Initial Brief, and the request is not intended for purposes of delay.

By the undersigned's calculations, the extension, if granted, would extend the deadline for filing the Initial Brief and Designation of Matter to Monday, March 9, 2015.

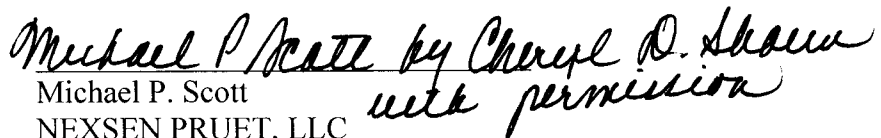
Pursuant to the Supreme Court's March 18, 2009 Order Re: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings, another member of the undersigned's firm has certified that this extension is warranted and that good cause exists to seek this extension.

The undersigned further requests that the time for filing be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Cheryl D. Shoun
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
Phone: 843.577.9440
Facsimile: 843.414.8238
CShoun@nexsenpruet.com



Michael P. Scott
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
Phone: 843.577.9440
Facsimile: 843.414.8254
MScott@nexsenpruet.com

Robert M. Dudek, Esquire
Chief Appellate Defender
South Carolina Commission on Indigent Defense
Appellate Division
1330 Lady Street, Suite 401
PO Box 11589
Columbia, SC 29201-1589

Attorney for Appellant

January 28, 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

JAN 30 2015

APPEAL FROM YORK COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

SC Court of Appeals

Case No. 2011-GS-46-01851
Appellate Case No. 2013-001953

The StateRespondent,

v.

Julia B. PhillipsAppellant.

PROOF OF SERVICE

I certify that on this 28th day of January, 2015, I have served the foregoing
THIRD MOTION FOR EXTENSION TO FILE INITIAL BRIEF OF APPELLANT via
U.S. Mail, first class postage prepaid, on the following counsel of record:

Donald J. Zelenka, Esquire
S.C. Attorney General's Office
P.O. Box 11549
Columbia, SC 29211-1549



Cheryl D. Shoun
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
Phone: 843.577.9440
Facsimile: 843.414.8238
CShoun@nexsenpruet.com
Attorney for Appellant

Cheryl D. Shoun
Special Counsel
Admitted in SC

January 28, 2015

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
P.O. Box 11629
Columbia, SC 29211

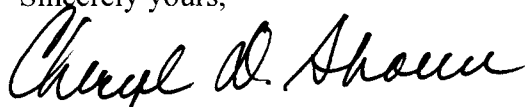
Re: *The State v. Julia B. Phillips*
Appellate Case No. 2013-001953

Dear Ms. Kitchings:

Enclosed for filing with the Court is an original and seven copies of the Third Motion for Extension to File Initial Brief of Appellant in the above-referenced matter. I would appreciate you filing the original and returning a clocked-in copy to me in the enclosed self-addressed stamped envelope.

By copy of this letter and as evidenced by the attached Proof of Service, we are serving Respondent and counsel of record with a copy of the same.

Sincerely yours,



Cheryl D. Shoun

CDS/ksh

cc: Robert Michael Dudek, Esquire
Donald J. Zelenka, Esquire
Julia B. Phillips (SCDC ID: 00356902)

Charleston

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

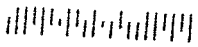
Myrtle Beach

Raleigh

RECEIVED

JAN 30 2015

SC Court of Appeals



NEXSEN PRUET

P. O. Box 486
Charleston SC 29402

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
P.O. Box 11629
Columbia, SC 29211

999995.274 MPS

RECEIVED
JAN 30 2015
SC Court of Appeals

