

**RECEIVED**

MAR 11 2015

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Judge C. Rauch Wise, Circuit Court Judge

Appellate Case No. 2014-000448

THE STATE,.....RESPONDENT

v.

DANIEL WILLIAM SPADE,.....APPELLANT.

**MOTION FOR EXTENSION OF TIME**

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to the Court today, pursuant to two previous extensions granted by the Court.

II.

However, due to oral argument in the Court of Appeals last Tuesday in the case of State v. Daniel Lopez and oral argument in the Supreme Court in the case of State v. Lexie Dial last Thursday. Although I began working on this case as soon as the Thursday oral argument was over, I have been unable to complete the Initial Brief since five separate issues have been raised. Therefore, I am respectfully requesting a final, fifteen-day extension.

III.

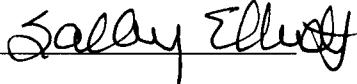
This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days; and for such other and further relief as the Court may deem just and proper.


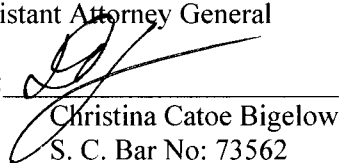
Respectfully submitted,

ALAN WILSON  
Attorney General

SALLEY W. ELLIOTT  
Senior Assistant Deputy Attorney General

BY: 

CHRISTINA CATOE BIGELOW  
Assistant Attorney General

 BY:   
Christina Catoe Bigelow  
S. C. Bar No: 73562

Office of the Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727

ATTORNEYS FOR RESPONDENT

March 11, 2015

STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
C. Rauch Wise, Circuit Court Judge

---

Appellate Case No. 2014-000448

**RECEIVED**

MAR 11 2015

**SC Court of Appeals**

THE STATE,.....RESPONDENT

v.

DANIEL WILLIAM SPADE,.....APPELLANT.

---

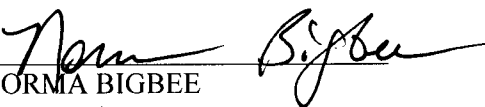
**PROOF OF SERVICE**

---

I, Norma Bigbee, certify that I have served the Motion for Extension of Time on Appellant by depositing two copies of the same in the United States mail, postage prepaid, addressed to his attorney of record, C. Rauch Wise, Esquire, 305 Main St., Greenwood, SC 29646.

I further certify that all parties required by Rule to be served have been served.

This 11<sup>th</sup> day of March, 2015.

  
\_\_\_\_\_  
NORMA BIGBEE  
Legal Assistant

Office of Attorney General  
Post Office Box 11549  
Columbia, SC 29211  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

March 11, 2015

RECEIVED

MAR 11 2015

SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211 -

RE: **State v. Randy Howze**  
**Appellate Case No: 2014-000718**

Dear Ms. Kitchings:

Please find the original of the Motion For Extension of Time along with proof of service, in the above-referenced case. By copy of this letter we are serving opposing counsel with this motion.

Sincerely,

  
Christina C. Bigelow  
Assistant Attorney General  
S.C. Bar No: 73562

DS/nb  
Enclosures

cc: C, Rauch Wise, Esquire (2 copies enclosed)  
Ms. Trisha Allen (1 copy enclosed)