

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Darlington County

Honorable R. Ferrell Cothran, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JAMECO ABDUL TONEY,

APPELLANT

APPELLATE CASE NO. 2013-002534

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

The undersigned counsel respectfully requests a five 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 February 6, 2015.
2. Counsel is a private attorney in Beaufort, South Carolina, representing the above-captioned appellate *pro bono* with the assistance of the South Carolina Commission on Indigent Defense. The South Carolina Commission on Indigent Defense has agreed to provide copying, binding and service of process of the appellant's brief to defray costs to Counsel. The additional

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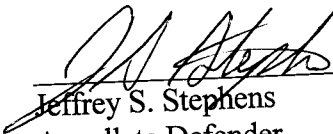
SC Court of Appeals

requested five day extension of time is necessary to have the appellant's initial brief copied and served on counsel and the Court.

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 five 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

February 5, 2015

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SC Court of Appeals

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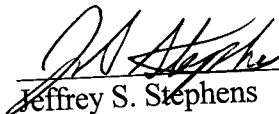
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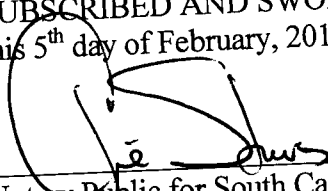
CERTIFICATE OF SERVICE

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 5th day of February, 2015.


Jeffrey S. Stephens
Appellate Defender

ATTORNEY FOR APPELLANT

SUBSCRIBED AND SWORN TO before me
this 5th day of February, 2015.



Notary Public for South Carolina (L.S.)
My Commission Expires: 05-25-17

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Quindlen Law Firm

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Jeffrey S. Stephens**
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Catherine Webb*
catherine@quindlenlaw.com

*also licensed in Connecticut
**also licensed in Florida

February 5, 2015

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

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

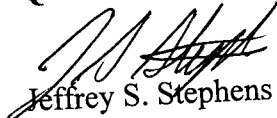
Dear Ms. Kitchings:

Enclosed please find the original and a copy each of the Petition for 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.

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SC Court of Appeals