

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
COURT OF GENERAL SESSIONS

The Honorable Letitia Verdin, Circuit Court Judge

RECEIVED

APR 13 2015

Appellate Case No. 2014-000420

SC Court of Appeals

THE STATE,

Respondent,

v.

JASON RANDALL MORGAN,

Appellant.

MOTION FOR FIRST EXTENSION OF TIME WITHIN  
WHICH TO SERVE AND FILE RECORD ON APPEAL

Appellant ("Jason Randall Morgan"), through his undersigned counsel, would respectfully show unto the Court as follows:

I.

The Record on Appeal was due to be served and filed on April 1, 2015. However, due to an extraordinary case load, as the exit of two associate attorneys has counsel for Appellant covering unexpected additional matters, and other cases pending before this Court, Circuit Courts and Summary Courts, counsel was unable, to serve and file the Record on Appeal by April 1, 2015. We would hereby respectfully request a brief amount of additional time within which to correctly file and serve the Record on Appeal

in this matter. Undersigned counsel does not believe this request will result in any prejudice to the Respondent should it be granted.

**II.**

This extension request is not intended for purposes of delay, but rather to ensure that the Record on Appeal in this matter is correctly and properly filed and served.

**WHEREFORE**, Appellant prays that the Court grant the Appellant's Motion for Extension of Time to file the Record on Appeal in this case for an additional ten (10) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.



DANIEL J. FARNSWORTH, JR.  
Attorney for Appellant  
Farnsworth Law Offices, LLC  
2 Williams Street  
Greenville, South Carolina 29601  
(864) 250-9119 (telephone)  
(864) 250-9120 (facsimile)  
[Dan@FarnsworthLawOffices.com](mailto:Dan@FarnsworthLawOffices.com)

April <sup>8<sup>th</sup></sup> 8, 2015

cc: Alan McCrory Wilson, Esquire  
Mary Shannon Williams, Esquire  
Williams Walter Wilkins, III, Esquire

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**PROOF OF SERVICE**

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I, Brad Tollison, certify that I have served the Motion for First Extension of Time Within Which to Serve and File Record on Appeal, by depositing a copy of the same in the United States mail, on the 9th day of April 2015 postage prepaid, addressed to:

Alan McCrory Wilson, Esquire  
Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211

Mary Shannon Williams, Esquire  
Assistant Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211

William Walter Wilkins, III, Esquire  
Solicitor, Thirteenth Judicial Circuit  
305 East North Street, Suite 325  
Greenville, South Carolina 29601

V. Claire Allen  
Deputy Clerk, Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201



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Brad Tollison  
Paralegal to Daniel J. Farnsworth, Jr.  
2 Williams Street  
Greenville, South Carolina 29601  
(864) 250-9119



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
www.sccourts.org

April 03, 2015

Mr. Daniel J. Farnsworth, Esquire  
PO Box 10196  
Greenville SC 29603

Re: The State v. Jason Randall Morgan  
Appellate Case No. 2014-000420

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SC Court of Appeals

Dear Counsel:

Upon reviewing your record on appeal, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The caption/title does not comply with Rule 267(a), SCACR. Specifically, the appellant's full name is not given as shown on the order being appealed and the front cover does not show all the attorneys for opposing counsel.
- The document has not been timely filed. Our records show the record on appeal was due to be served upon opposing counsel no later than April 1, 2015. A motion to allow the late filing will have to be made.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Alan McCrory Wilson, Esquire  
Mary Shannon Williams, Esquire  
William Walter Wilkins, III, Esquire

# FARNSWORTH LAW OFFICES, LLC

ATTORNEYS AND COUNSELORS AT LAW

2 WILLIAMS STREET  
POST OFFICE BOX 8719  
GREENVILLE, SOUTH CAROLINA 29604

DANIEL J. FARNSWORTH, JR.\*

\* ALSO ADMITTED TO PRACTICE IN VIRGINIA

TELEPHONE: 864.250.9119  
FACSIMILE: 864.250.9120

April 8, 2015

V. Claire Allen  
Deputy Clerk, Court of Appeals  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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Re: The State v Jason Randall Morgan  
Appellate Case Number: 2014-000420

SC Court of Appeals

Dear Ms. Allen,

Please find enclosed a copy of the letter we received along with fifteen (15) labels that read "JASON RANDALL MORGAN" to correct the caption "JASON MORGAN," as well as fifteen (15) labels that read "William Walter Wilkins, III, Esq., Solicitor, Thirteen Judicial Circuit, 305 East North Street, Suite 325, Greenville, South Carolina 29601, Attorney for Respondent" to add to the Attorneys for Respondent.

We have also enclosed six (6) copies and the original Motion for First Extension of Time Within Which to Serve and File Record on Appeal, as well as Proof of Service.

Thank you for your understanding and kind assistance. Should you have any questions or concerns please do not hesitate to contact us.

With kind regards, I remain



Daniel J. Farnsworth, Jr.

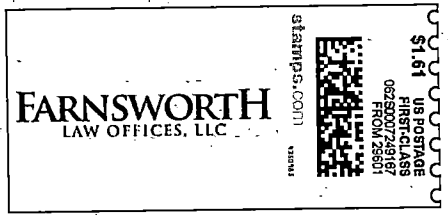
Enclosures

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V. Claire Allen  
Deputy Clerk, Court of Appeals  
South Carolina Court of Appeals  
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Columbia, South Carolina 29201

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