

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 25 2015

Appellate Case No. 2014-000420

**SC Court of Appeals**

THE STATE,

Respondent,

v.

JASON RANDALL MORGAN,

Appellant.

MOTION TO FILE RECORD ON APPEAL OUT OF TIME

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

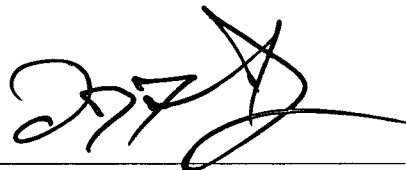
**I.**

The Record on Appeal was due to be served and filed on April 1, 2015, however, it was filed and served April 2, 2015. Due to an extraordinary case load, as the exit of two associate attorneys has counsel for Appellant covering unexpected additional matters, counsel was unable to serve and file the Record on Appeal by April 1, 2015. Counsel for Appellant was actually mistaken, thinking the deadline for filing its Record on Appeal was April 2, 2015, however, realized after discussions with the Court’s clerk that counsel had made an error in determining the date on which filing was to have been

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

**II.**

**WHEREFORE**, Appellant prays that the Court grant the Appellant's Motion to File Record on Appeal Out of Time in this case, 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  
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(864) 250-9120 (facsimile)  
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April <sup>4</sup>~~20~~, 2015

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

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
COURT OF GENERAL SESSIONS

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APR 23 2015

**SC Court of Appeals**

THE STATE,

v.

JASON RANDALL MORGAN,

Respondent,

Appellant.

**PROOF OF SERVICE**


I, Brad Tollison, certify that I have served the Motion to File Record on Appeal Out of Time, by depositing a copy of the same in the United States mail, on the 20th 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

  
Brad Tollison  
Paralegal to Daniel J. Farnsworth, Jr.  
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Greenville, South Carolina 29601  
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# FARNSWORTH LAW OFFICES, LLC

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DANIEL J. FARNSWORTH, JR.\*

\* ALSO ADMITTED TO PRACTICE IN VIRGINIA

TELEPHONE: 864.250.9119  
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April 20, 2015

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APR 23 2015

SC Court of Appeals

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

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

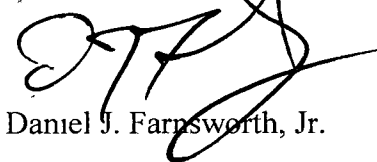
Dear Ms. Allen,

Please find enclosed six (6) copies and the original Motion to File Record on Appeal Out of Time, 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

Yours very truly,



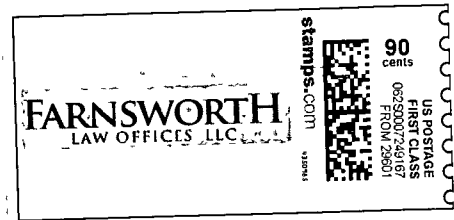
Daniel J. Farnsworth, Jr.

Enclosures

**FARNSWORTH LAW OFFICES, LLC**

ATTORNEYS AND COUNSELORS AT LAW

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