

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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APR 20 2015

SC Court of Appeals

Appeal from Greenville County
Honorable J. Derham Cole, Circuit Court Judge
Appellate Case No. 2014-001092

THE STATE,

Respondent,

vs

NORMAN QUINTON HUNT,

Appellant

**MOTION FOR EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE REPLY BRIEF OF APPELLANT**

Appellant, through his undersigned counsel, would respectfully show unto the court as follows:

I.

The Reply Brief of Appellant is due to be served and filed on April 19, 2015.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of South Carolina Supreme Court dated March 18, 2009, the Appellant moves for an extension in the above-referenced criminal appeal and asks for an additional ten days to complete the brief in this case. The Initial Brief of Respondent was received in Mr. Quinn's office on April 9, 2015 while Mr. Quinn was out of town on vacation. Mr. Quinn has just returned to the office today and requests additional time to respond to the thirty page Initial Brief of Respondent.

III.

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

WHEREFORE, Appellant prays that the Court extend the deadline for the service and filing of the Reply Brief of Appellant in this case for 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.

Respectfully submitted,

THOMAS J. QUINN
Attorney for Appellant

By Thomas J. Quinn
Thomas J. Quinn

Thomas J. Quinn
109 Laurens Road
Building 4 Suite D
Greenville, SC 29607
(864) 232-9590

April 16, 2015

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Appeal from Greenville County
Honorable J. Derham Cole, Circuit Court Judge
Appellate Case No. 2014-001092

THE STATE,

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Appellant

PROOF OF SERVICE

I, Michelle S. Jensen, certify that I have served the within Motion for Extension of Time Within Which to Serve and File Reply Brief of Appellant by depositing two copies of the same in the United States Mail, postage prepaid, addressed to

Mark R. Farthing, Assistant Attorney General
Office of the Attorney General
P O Box 11549
Columbia, SC 29211-1549

I also certify that all parties required by Rule to be served have been served
This 16th day of April 2015



MICHELLE S. JENSEN
Legal Secretary
Thomas J. Quinn
109 Laurens Road
Building 4 Suite D
Greenville, SC 29607
864-232-9590



Thomas J. Quinn
Attorney at Law

DEFENDING YOUR FUTURE

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APR 20 2015

SC Court of Appeals

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April 16, 2015

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

RE: State v. Norman Quinton Hunt – Appellate Case 2014-001092

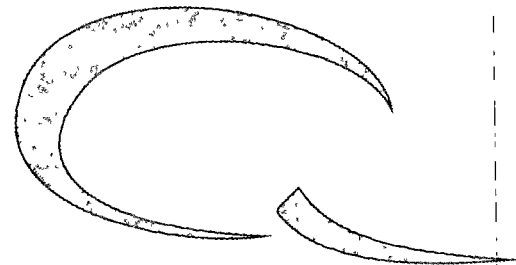
Dear Ms. Kitchings,

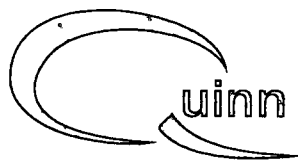
Enclosed please find the original and six (6) copies of the Motion for Extension of Time Within Which to Serve and File Reply Brief of Appellant, along with proof of service, for filing in the above-referenced appeal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom', written over a horizontal line.

Thomas J. Quinn
Counsel for Appellant
Bar number 4616





Thomas J. Quinn
Attorney at Law

109 Laurens Road, Building 4, Suite D
Greenville, SC 29607

To: The Honorable Jenny A. Kitchings
Clerk, SC Court of Appeals
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals