

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

MAY 01 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 SECOND 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 29, 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 thirty 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 returned to the office on April 16, 2015 and requested additional time to respond to the thirty page Initial Brief of Respondent. Mr. Quinn has appeared in Court each day but one since April 16 and is scheduled to be out of the office attending to a family matter from May 1 until May 12, 2015. Due to this Mr. Quinn asks, again, for an extension of time to prepare, serve and file the Reply Brief of Appellant.

III.

This extension request is not intended for purposes of delay but to ensure that the brief is properly researched and prepared. This case has required significant research because the case involves a significant evidentiary issue on appeal. The undersigned is currently working on the Brief in this case and hopes to have it completed in a timely manner. I would therefore request an extension of time within which to serve and file the Reply Brief.

**WHEREFORE**, Appellant prays that the Court extend the deadline for the service and filing of the Reply Brief of Appellant in this case for thirty (30) 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 29, 2015

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

MAY 01 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,

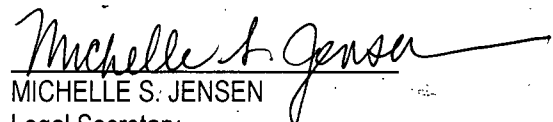
Appellant.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

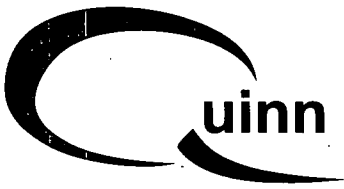
I, Michelle S. Jensen, certify that I have served the within Motion for Second Extension of Time Within Which to Serve and File Reply Brief of Appellant by depositing two copies of the same in the United States Mail, postage prepaid, addressed to:

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 29<sup>th</sup> 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

**RECEIVED**

MAY 01 2015

**SC Court of Appeals**

109 Laurens Road  
Building 4, Suite D  
Greenville, SC 29607  
Phone: 864-232-9590  
tq@TomQuinnAttorney.com  
www.TomQuinnAttorney.com

April 29, 2015

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

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

Dear Ms. Kitchings,

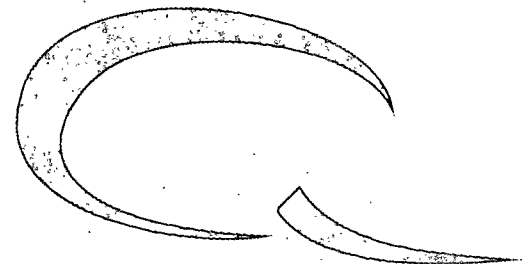
Enclosed please find the original and six (6) copies of the Motion for Second Extension of Time Within Which to Serve and File Reply Brief of Appellant, along with proof of service, for filing the above-referenced appeal.

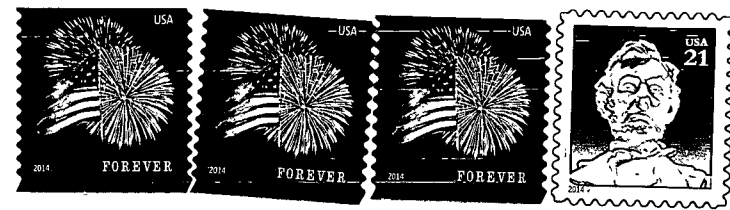
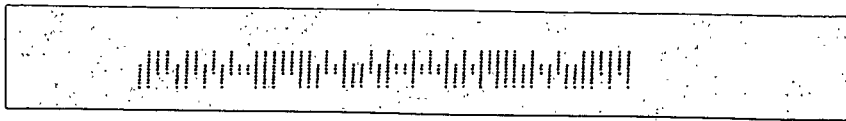
Very Truly Yours,

A handwritten signature in black ink that reads "THOMAS J. QUINN". The signature is written in a cursive style with capital letters.

Thomas J. Quinn  
Attorney at Law

TJQ/msj  
Enclosures

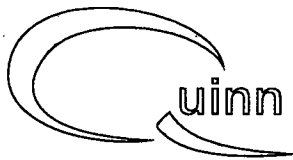




**RECEIVED**

MAY 01 2015

**SC Court of Appeals**



**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