

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from York County
J. Derham Cole, Circuit Court Judge

Appellate Case No. 2013-001953

RECEIVED
MAY 26 2015
SC Court of Appeals

THE STATE,

Respondent,

vs.

JULIA B. PHILLIPS,

Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER**

Respondent's Initial Brief is due today, May 26, 2015. The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following:

1. The attorney for the Respondent has had and are scheduled to have a number of State and Federal matters to attend to;
(A) Glenn Pernell v. Warden, (Federal Habeas Return) **filed April 6, 2015 in the U.S. District Court (approximately 85 pages);**
(B) State v. Steven Otts (IBOR) (Murder) **filed May 8, 2015 in the S.C. Court of Appeals;**
(C) Donovan Murray v. Stevenson (Federal Habeas Return) **filed April 1, 2015 in the U.S. District Court;**

(D) State v. Kelvin Jackson (Murder)(Initial Brief of Respondent) **filed in the S.C. Court of Appeals on April 15, 2015;**

(E) Johnnie Jones v. Warden (Federal Habeas Return) **filed April 9, 2015 in the U.S. District Court;**

(F) Rayshawn Pearson v. McFadden (Federal Habeas Return) **filed April 14, 2015 in the U.S. District Court;**

(G) Jackie Lee Boyd v. Cartledge (Federal Habeas Return) **filed April 16, 2015 in the U.S. District Court;**

(H) William O. Dickerson v. State (Capital PCR) attendance on behalf of Respondent for **motion hearing held on May 8, 2015 before Judge G. Thomas Cooper;**

(I) Adarius Dennis v. Cartledge (Federal Habeas Return) **filed May 13, 2015 in the U.S. District Court;**

(J) Michael E. Minor v. Cartledge (Federal Habeas Return) **filed May 19, 2015 in the U.S. District Court;**

(K) Corey Larkin v. Stevenson (Federal Habeas Return) **filed May 21, 2015 in the U.S. District Court;**

and other matters;

However, due to counsel's involvement in these and other matters pending in state and federal court, counsel is unable to timely complete the Initial Brief of Respondent in this proceeding. Thus, counsel is requesting an extension of time in which to file the Brief in this matter. This request is made in good faith, and not for the purposes of delay.

WHEREFORE, premises considered, for good cause shown, counsel hereby respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter.

Respectfully Submitted,

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Attorney General

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By: _____


ANTHONY MABRY
ATTORNEYS FOR RESPONDENT

May 26, 2015

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THE STATE,

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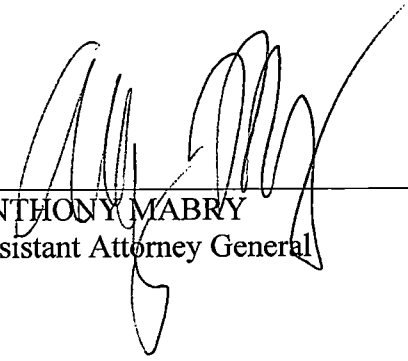
vs.

JULIA B. PHILLIPS,

Appellant.

CERTIFICATE OF SERVICE

I, Anthony Mabry, hereby certify that I have served the Motion for an Extension to File Initial Brief of Respondent and Designation of Matter by depositing copy in the United States Mail to Michael P. Scott, Esquire, Nexsen Pruet, LLC, P. O. Box 486, Charleston, SC 29402 and by InterAgency mail to Robert M. Dudek, Chief Appellate Defender, Division of Appellate Defense, 1330 Lady Street, Suite #401, Columbia, South Carolina 29201 this 26th day of May, 2015.



ANTHONY MABRY
Assistant Attorney General