

76078

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

MAY 26 2015

SC Court of Appeals

Appeal from Greenville County
Honorable Robin B. Stilwell, Circuit Court Judge
Appellate Case No. 2014-002317

MARIA MOYAO,

APPELLANT,

vs.

THE STATE,

RESPONDENT.

**MOTION FOR FIRST EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE THE INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER**

Appellant ("Maria Moyao") through her undersigned counsel, would respectfully show unto the Court as follows:

I.

The Initial Brief of Appellant and Designation of Matter were due to be served and filed May 21, 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, I am unable, without undertaking an extremely heavy burden, to complete the Brief on time. The undersigned counsel apologizes for any inconvenience this request has caused the Court and to the Respondent and does not believe this request will result in any prejudice to the petitioner should it be granted.

II.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared. I would therefore ask this Court to accept the Appellant's motion for an extension of time and grant an extension of time within which to file the Initial Brief of Appellant and Designation of Matter.

WHEREFORE, Appellant prays that the Court grant the Appellant's Motion for Second Extension of Time Within Which to Serve and File the Initial Brief of Appellant and Designation of Matter 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,

By: 

DANIEL J. FARNSWORTH, JR.
Attorney for Appellant
Farnsworth Law Offices, LLC
2 Williams Street
Greenville, South Carolina 29601
(864) 250-9119