

THE STATE OF SOUTH CAROLINA

In The Supreme Court

APPEAL FROM CHESTERFIELD COUNTY
Court of General Sessions

J. Michael Baxley, Circuit Court Judge

Appellate Case No. 2015-000606

RECEIVED

JUN - 1 2015

S.C. Supreme Court

The State of South Carolina,.....Appellant,

v.

Graham Franklin Douglas,.....Respondent.

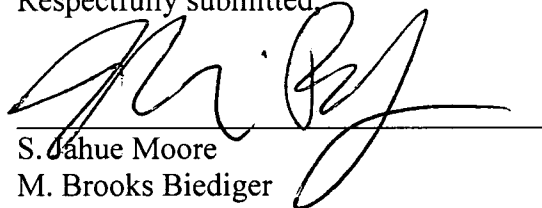
MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney, for Respondent Graham Franklin Douglas moves for an extension of the deadline for serving and filing the Respondent's Return to the Appellant's Petition for Writ of Certiorari. The Petition was served on the Respondent on April 10, 2015. The Return were due originally to be filed by Respondent on May 10, 2015. A twenty (20) day extension to file the Respondent's Return to the Appellant's Petition for Writ of Certiorari was granted, extending the filing deadline filing to June 1, 2015.

At present, counsel is under an unusually heavy trial and hearing schedule, and will be unable to complete the Return by the June 1, 2015, deadline. Accordingly, counsel respectfully

moves for a seven (7) day extension in which to file the Respondent's Return to the Appellant's Petition for Writ of Certiorari. If granted, the new deadline for filing the Return will be June 8, 2015.

Respectfully submitted,



S. Jahue Moore
M. Brooks Biediger
Margaret "Meg" Hazel
Moore Taylor Law Firm, P.A.
1700 Sunset Boulevard
P.O. Box 5709
West Columbia, South Carolina 29171
Telephone: 803-796-9160
Facsimile: 803-791-8410

Attorneys for Respondent Graham Douglas

West Columbia, South Carolina

June 1, 2015

THE STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

APPEAL FROM CHESTERFIELD COUNTY
Court of General Sessions

J. Michael Baxley, Circuit Court Judge

Case No. 2015-000606

The State of South Carolina,.....Appellant,

v.

Graham Franklin Douglas,.....Respondent.

PROOF OF SERVICE

I certify that I have served a filed the Motion for Extension of Time on the parties listed below by depositing a copy in the United State Mail, postage prepaid, on June1, 2015, addressed as indicated below.

Alphonso Simon, Jr.
Assistant Attorney General
South Carolina Attorney General's Office
P.O. Box 11549
Columbia, SC 29211

MOORE TAYLOR LAW FIRM, P.A.

BY: 

S. Jahue Moore
M. Brooks Biediger
1700 Sunset Boulevard
P. O. Box 5709
West Columbia, SC 29171
(803) 796-9160

ATTORNEYS FOR RESPONDENT

West Columbia, South Carolina
June 1, 2015

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Robert D. Hazel
Christian G. Spradley
C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
M. Brooks Biediger
Amber Cary Fulmer
Sarah Taylor Cassidy
Margaret "Meg" Hazel
Billy C. Coleman (Ret.)

RECEIVED

JUN - 1 2015

June 1, 2015

S.C. Supreme Court

The Honorable Daniel E. Shearouse
Clerk of Court Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: State vs. Graham Franklin Douglas
Appellate Case No. 2015-000606

Dear Mr. Shearouse:

Enclosed you will please find the original and six (6) copies of our Motion for Extension of Time in the above-referenced matter.

Please let me know if you have any questions concerning this correspondence.

Yours very truly,


M. Brooks Biediger

MBB:arg
Enclosures
cc: Alphonso Simon, Jr., Esquire - w/ enclosure