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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 02 2015
SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
In the Court of General Sessions

The Honorable R. Keith Kelly, Circuit Court Judge

Case No. 2011-GS-42-04171
Appellate Case No. 2014-000448

State of South Carolina,

Respondent,

v.

Daniel William Spade,

Appellant.

MOTION TO EXTEND TIME TO FILE
RECORD ON APPEAL

The Appellant moves this Court to extend the deadline to file the Appellant's Initial Brief to June 10, 2015. The current deadline is May 29, 2015. The undersigned so moves and certifies based upon the following extraordinary circumstances:

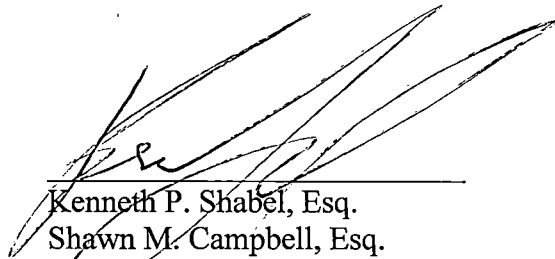
- (a) Appellant and Respondent submitted Designations of Matter for the Record on Appeal which differed as to what portions of the transcript would be included. It appeared as if a Motion would be required to have the Court address the issue.
- (b) However, on Thursday, May 28, 2015, the attorney for the Respondent and the attorney for the Petitioner reached an agreement as to what

would be included. The Record on Appeal has been redacted and was submitted to the printers for binding and copies but would not be completed prior to May 29, 2015.

- (c) Based on information and belief, the attorney for the Respondent has agreed to a short extension with which to file the Record on Appeal in light of the agreement on what was to be included therein.

The undersigned certifies that this is for good cause and is not intended to cause unnecessary delay.

The undersigned so moves this 29th day of May, 2015.



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864-229-5010
Attorneys for Appellant

Other Counsel Who have Filed an Initial Brief:

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Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
803-734-3737

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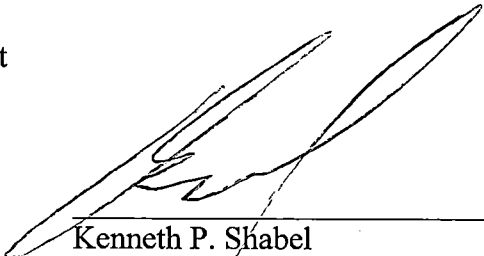
Appellant.

PROOF OF SERVICE

I hereby certify that a copy of the foregoing Motion to Extend Time was served upon all counsel of record by U.S. Postal Service first class mail, postage prepaid, on May 29, 2015 to the addresses as follows:

Christina Catoe Bigelow
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
803-734-3737
Attorney for Respondent

May 29, 2015



Kenneth P. Shabel
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(864) 583-0001

Shawn M. Campbell
Kenneth P. Shabel

Campbell & Shabel

ATTORNEYS AT LAW

OF COUNSEL:
Sean Giovannetti

Sender's Email: kshabel@gc-lawfirm.com

Friday, May 29, 2015

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SC Court of Appeals

VIA Facsimile and Regular Mail
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: State of South Carolina v. Daniel William Spade
Appellate Case No. 2014-000448

Dear Ms. Kitchings:

Enclosed you will also find an original and six (6) copies of our Motion to Extend Time for Filing the Record on Appeal, along with Proof of Service of the same and the required filing fee.

Do not hesitate to contact me if you have further questions or need additional information.

Best regards,



Kenneth P. Shabel
Attorney for Daniel William Spade

cc: Christina Catoe Bigelow
C. Raush Wise

CAMPBELL & SHABEL, LLC
175 MAGNOLIA STREET, SUITE 201
SPARTANBURG, SC 29306



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The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
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