

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of General Sessions

Roger M. Young, Sr., Circuit Court Judge

---

Case No. 2011-GS-5527 / 2011-GS-5528 / 2011-GS-5531  
Appellate Case No. 2014-001051

---

Joseph Todd Rowland.....Appellant,

v.

State of South Carolina.....Respondent.

---

**MOTION FOR EXTENSION OF TIME WITH WHICH TO SERVE AND FILE REPLY BRIEF OF  
APPELLANT**

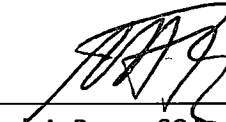
---

Pursuant to Rule 240, SCACR, the Appellant requests a 30-day extension of the deadline for filing and serving his reply brief in this case. The current deadline is July 15, 2015. This is the second extension request for this deadline. This extension request is not intended for purposes of delay, but rather to ensure that the Reply Brief is properly researched and prepared. The Reply Brief on the above case has required significant time and research because the case involved two separate and distinct issues on appeal, and further, Counsel has been required to extensively meet and fully explain to Appellant the procedures of appellate court and his duties as counsel, which at times, have been contrary to Appellant's instructions and demands.

**RECEIVED**  
JUN 17 2015  
SC Court of Appeals

June 15, 2015

Respectfully Submitted,



---

Mark A. Peper, SC Bar #72624

The Peper Law Firm, PA

1637 Savannah Highway, Suite 202

Charleston, South Carolina 29407

(843) 225-2520

(843) 225-2554 (facsimile)

[mark@peperlawfirm.com](mailto:mark@peperlawfirm.com)

MARK A. PEPPER, ESQ.  
MARK@PEPERLAWFIRM.COM



THE PEPPER LAW FIRM, PA  
1637 SAVANNAH HWY., STE. 202  
CHARLESTON, SC 29407  
843.225.2520 (O)  
843.225.2554 (F)

June 10, 2015

WWW.PEPPERLAWFIRM.COM

RECEIVED

JUN 17 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211


RE: State of South Carolina v. Joseph Todd Rowland – Appellate Case No. 2014-001051  
2011-GS-10-5527 / 2011-GS-10-5528 / 2011-GS-10-5531

Dear Ms. Kitchings:

Please find enclosed for filing the original and six (6) copies of the Motion for Extension of Time with Which to Serve and File Appellant's Reply Brief, along with a Proof of Service.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact my office.

With best regards, I am

Sincerely,  
  
Mark Peper, Esq.

Enclosures as stated.

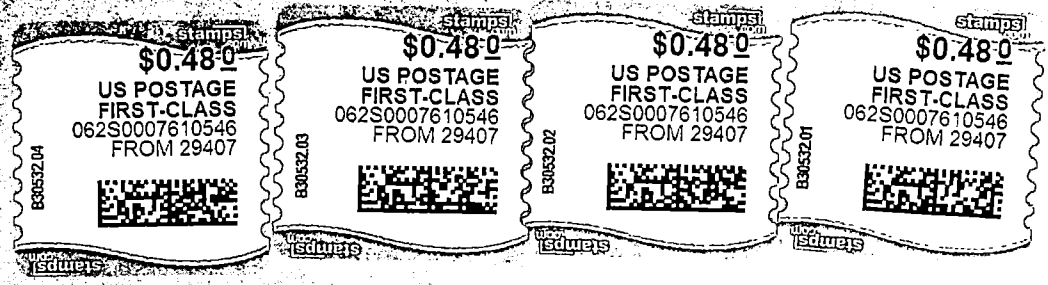
Cc: Stephanie Linder, Assistant Solicitor, Ninth Circuit (via US Mail)  
Mark R. Farthing, Office of Attorney General (via US Mail)



South Carolina Association  
Of Criminal Defense Lawyers



Low Firm, PA  
Hug  
2  
SC 29407



Re Hon. JERRY ALTON KITCHINGS  
Clerk, SC Ct. of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
JUN 17 2015  
SC Court of Appeals