

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

CASE NUMBER: 2014-001391

Appeal From Florence County
Honorable D. Craig Brown, Circuit Court Judge

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JUN 22 2015

SC Court of Appeals

THE STATE,

RESPONDENT

vs.

DAMON E. MOODY,

APPELLANT

**MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF
TO BE INCLUDED IN RECORD OF APPEAL**

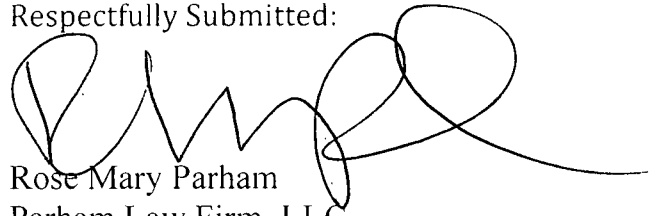
This Motion comes before the Court pursuant to Rule 208 of the South Carolina Rules of Court and requests that the Appellant be allowed an extension of 10 days to file his Reply Brief.

This motion is based on the following facts. The undersigned has had an extremely high workload in the last several weeks which has included her making almost daily court appearances. Further, the undersigned has been in preparation for a federal trial in the case of *USA vs. Dong, et al.*, which is a complex case which involves over 133,000 pages of discovery. This trial is set to begin on June 22, 2015, in Charleston, South Carolina. (Please see the attached notice) Due to this, the undersigned has been unable to complete the Defendant's Reply Brief. In light of this, the Defendant requests that an extension be granted, thus making his Reply Brief due on or before July 3, 2015.

It is therefore requested of this Honorable Court that an extension to file this information be ordered.

[SIGNATURE PAGE TO FOLLOW]

Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'RMP', with a long horizontal flourish extending to the right.

Rose Mary Parham
Parham Law Firm, LLC
P.O. Box 1514
Florence, South Carolina 29503
(843)407-7757 (office)
(843) 407-7758 (facsimile)
Bar Number 17032

Attorney for Appellant

Rose Mary Parham

From: SCDEfilingstat@scd.uscourts.gov
Sent: Wednesday, June 17, 2015 1:03 PM
To: scd_ecf_nef@scd.uscourts.gov
Subject: Activity in Case 2:11-cr-00511-DCN USA v. Dong et al Notice of Hearing

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

District of South Carolina

Notice of Electronic Filing

The following transaction was entered on 6/17/2015 at 1:03 PM EDT and filed on 6/17/2015

Case Name: USA v. Dong et al
Case Number: 2:11-cr-00511-DCN
Filer:
Document Number: 549(No document attached)

Docket Text:

NOTICE OF HEARING as to Jian-Yun Dong, Vaxima Inc, GenPhar Inc Bench Trial set for 6/22/2015 09:30 AM in Charleston Courtroom #2, Hollings Judicial Center, 83 Meeting St, Charleston before Honorable David C Norton. (cmur,)

2:11-cr-00511-DCN-1 Notice has been electronically mailed to:

G Wells Dickson, Jr chas@wellsdickson.com

Stanley D Ragsdale stan.ragsdale@usdoj.gov, USA-SC-ECF-Docket-M@usdoj.gov, USA-SC-ECF-FLU@usdoj.gov, USA-SC-ECF-VW-COL@usdoj.gov, lesa.fischer@usdoj.gov

Rose Mary Parham parhamlaw@sc.twebc.com, .

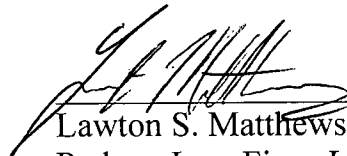
Eric J Klumb eric.klumb@usdoj.gov, USA-SC-ECF-Docket-M@usdoj.gov, USA-SC-ECF-FLU@usdoj.gov, USA-SC-ECF-VW-CHAS@usdoj.gov, angela.o'neill@usdoj.gov, francie.kasell@usdoj.gov

Nathan Stuart Williams nathan.williams@usdoj.gov, USA-SC-ECF-Docket-M@usdoj.gov, USA-SC-ECF-FLU@usdoj.gov, USA-SC-ECF-VW-CHAS@usdoj.gov, francie.kasell@usdoj.gov,

CERTIFICATE OF SERVICE

I, Lawton S. Matthews, hereby certify that a copy of the Appellant's Motion for Extension of Time to File Reply Brief was served on counsel for the Respondent this 19th day of June, 2015, via U.S. mail, postage prepaid, at the following address:

Salley W. Elliott, Esq.
Senior Asst. Deputy Attorney General
P.O. Box 11549
Columbia, SC 29211


Lawton S. Matthews
Parham Law Firm, LLC

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JUN 22 2015

SC Court of Appeals

P A R H A M

PARHAM LAW FIRM, LLC

June 19, 2015

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JUN 22 2015
SC Court of Appeals

VIA U.S. Mail

Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Regarding: **The State, Respondent v.**
 Damon E. Moody, Appellant
Appellate Case No.: **2014-001391**

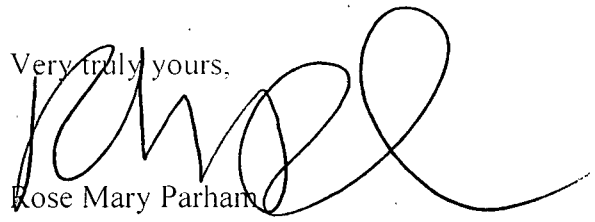
Dear Clerk of Court,

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension of Time to File Reply Brief to be Included in Record of Appeal which is being forwarded to you for filing. I ask that you please file the originals and send one closed copy back to me in the envelope I have provided.

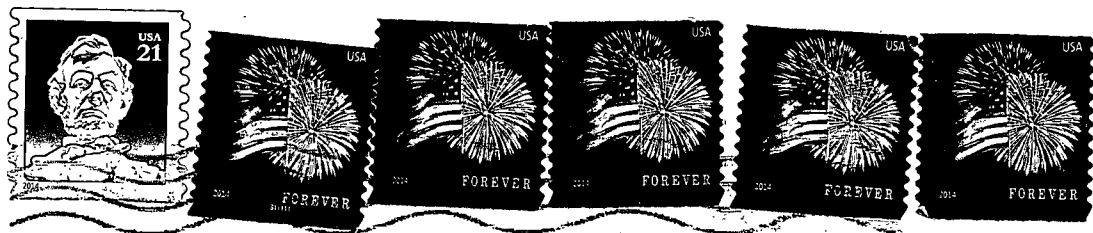
By copy of this letter, I am serving Salley W. Elliott, Esq., counsel for the Respondent, with a copy of the same.

Should you have any questions or comments, please do not hesitate to contact me.

Very truly yours,


Rose Mary Parham

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www.rosemaryparham.com



COLUMBIA SC 292

FRI 19 JUN 2015 PM

Parham Law Firm, LLC
Post Office Box 1514
Florence, SC 29503

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SC Court of Appeals

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