

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

JUN 23 2015

SC Court of Appeals

Appeal from Greenville County
Letitia H. Verdin, Circuit Court Judge
Steven H. John, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

PATRICK DEAN LOWRANCE,

APPELLANT

Appellate Case No. 2013-000320

**MOTION TO ACCEPT THE INITIAL BRIEF OF APPELLANT
OUT OF TIME**

Pursuant to Rule 240, SCACR, David S. Jones, Counsel for Patrick Dean Lowrance, respectfully requests the Court to accept the Initial Brief of Appellant in this case out of time. In support of this request, counsel shows:

(1) The Initial Brief of Appellant was due to be served and filed with this Court on December 22, 2014 in accordance with Rule 211, SCACR.

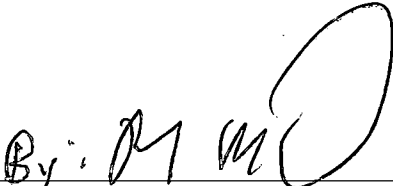
(2) Late in 2014, Counsel for Mr. Lowrance began experiencing what he now recognizes as a severe depression. Counsel sought treatment for the same, but was unable to fully and effectively manage the condition until recently.

(3) Due to Counsel's condition, he failed to timely complete and serve the Initial Brief at the allotted time.

(4) Counsel now has completed the Initial Brief of Appellant, and humbly and respectfully requests that the Court accept the same out of time.

(5) Counsel has consulted with opposing Counsel, Salley W. Elliot, and understands that she has no objection to this motion.

WHEREFORE, Counsel for Appellant respectfully requests the Court accept the Initial Brief of Appellant as filed out of time.

By: 

David S. Jones
Private Appointed Counsel (pro-bono)

Robert M. Dudek
Chief Appellate Defender

ATTORNEYS FOR APPELLANT

June 23rd, 2015

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CERTIFICATE OF SERVICE


The undersigned attorney hereby certifies that a true copy of the Motion to Accept the Initial Brief of Appellant Out of Time in the above referenced case has been served upon Salley W. Elliot, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 23rd day of June, 2015.

By: 

David S. Jones
Private Appointed Counsel (pro-bono)

Robert M. Dudek
Chief Appellate Defender
ATTORNEYS FOR APPELLANT

SUBSCRIBED AND SWORN TO before me
this 23rd day of June, 2015.



(L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.