

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Richland County
Robert E. Hood, Circuit Court Judge

Appellate Case No: 2014-001203

RECEIVED

JUN 24 2015

SC Court of Appeals

THE STATE.

Respondent,

v.

ROBERT ANTONIO GUINYARD,

Appellant.

MOTION FOR EXTENSION OF TIME

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

Appellant has appealed his convictions for homicide by child abuse and unlawful conduct towards a child.

II.

The Initial Brief of Respondent and Designation of Matter are due to the Court tomorrow, June 25, 2015, pursuant to a third extension granted by the Court.

III.

Due to the unusually long trial transcript in this matter (over 1,800 pages), and other work (including the creation of summaries of and training materials on the Domestic Violence Reform Act that went into effect on June 4, as well as the provision of technical

assistance on the Act and the preparation of and conducting of four trainings for a total of over 400 law enforcement officers and prosecutors on June 19 and 25), the undersigned counsel needs five (5) additional days to finish the preparation of Respondent's Initial Brief and Designation of Matter.

IV.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

V.

A third extension of five (5) days is being requested in the appeal of the co-defendant, Courtney Shante Thompson (the Initial Brief of Respondent and Designation of Matter in that case is due tomorrow, June 25, as well).

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for five (5) days; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN MCCRORY WILSON
Attorney General

BY: Alan Wilson

SALLEY W. ELLIOTT
Senior Assistant Deputy Attorney General

BY: Salley Elliott

AMIE L. CLIFFORD
Special Assistant Attorney General
aclifford@cpc.sc.gov

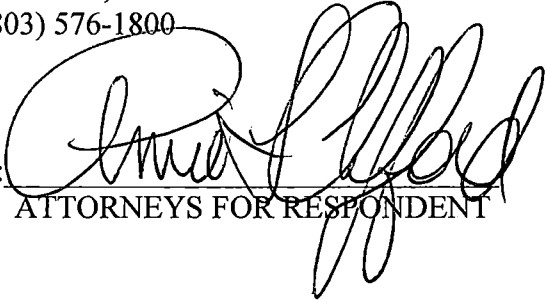
Post Office Box 11549
Columbia, South Carolina 29211

(803) 734-3727

DANIEL E. JOHNSON
Solicitor, Fifth Judicial Circuit

P.O. Box 192
Columbia, South Carolina 29202
(803) 576-1800

BY:

A handwritten signature in black ink, appearing to read "Daniel E. Johnson", written over a horizontal line.

ATTORNEYS FOR RESPONDENT

June 24, 2015

Columbia, South Carolina

STATE OF SOUTH CAROLINA
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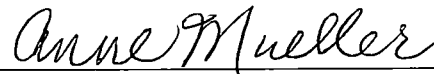
ROBERT ANTONIO GUINYARD,

Appellant.

PROOF OF SERVICE

I, Anne Mueller, certify that I have today served the Motion for Extension of Time on Appellant by depositing one copy of the same in the United States mail, postage prepaid, addressed to each of his two attorneys of record, Matthew G. Gerald, Esquire, Barnes, Alford, Stork & Johnson, LLP, P.O. Box 8448, Columbia, South Carolina 29202; and Robert M. Dudek, South Carolina Commission of Indigent Defense, Office of Appellate Defense, P.O. Box 11589, Columbia, South Carolina 29211.

I further certify that all parties required by Rule to be served have been served.



ANNE MUELLER
Legal Assistant
Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

June 24, 2015

Columbia, South Carolina



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SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

June 24, 2015

Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Re: *State v. Robert Antonio Guinyard* (Appellate Case No. 2014-001203)

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of my motion for a fourth extension for the service and filing of the Initial Brief of Respondent and Designation of Matter in the above-referenced case. I have also enclosed the original Proof of Service.

By copy of this letter, opposing counsel are being served with a copy of the Motion.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

Anne L. Clifford
Special Assistant Attorney General
aclifford@cpc.sc.gov
S.C. Bar No. 1285

Enclosures

cc: Matthew G. Gerrald, Esquire, Counsel for Appellant
Robert M. Dudek, Chief Appellate Defender, Counsel for Appellant
(each with one copy of the Motion and Proof of Service)