

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of General Sessions

RECEIVED

The Honorable Robert E. Hood, Circuit Court Judge JUL 10 2015

SC Court of Appeals

Appellate Case No. 2012-001203
General Sessions Case Nos. 2013-GS-40-06520 & 2013-GS-40-06521

The State of South Carolina,..... Respondent,

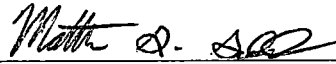
v.

Robert Antonio Guinyard,..... Appellant.

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Pursuant to Rules 263(b) and 240, SCACR, the undersigned counsel for Appellant respectfully requests a ten (10) or eleven (11) day extension of the deadline for filing Appellant's Reply Brief, which is currently due either July 10 or 11, 2015 (depending on when Respondent is deemed to have served its initial brief). With the extension, the new deadline would be July 21, 2015. The grounds for this request are that the undersigned is appointed counsel as part of the 2014 Appellate Practice Project, the trial transcript is over 1,800 pages long, and, given the other demands of his practice, the undersigned needs additional time to properly review the record and Respondent's Initial Brief and prepare Appellant's Reply Brief. The undersigned has consulted with Amie L. Clifford,

Esquire, counsel for Respondent, who indicated she has no objection to this request.



Matthew G. Gerrald
Barnes, Alford, Stork & Johnson, LLP
1613 Main Street (29201)
Post Office Box 8448
Columbia, SC 29202
(803) 799-1111

Robert M. Dudek
S.C. Commission on Indigent Defense
1330 Lady Street, Suite 401 (29201)
Post Office Box 11589
Columbia, SC 29211
(803) 734-1330

Attorneys for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUL 10 2015

APPEAL FROM RICHLAND COUNTY
Court of General Sessions

SC Court of Appeals

The Honorable Robert E. Hood, Circuit Court Judge

Appellate Case No. 2012-001203
General Sessions Case Nos. 2013-GS-40-06520 & 2013-GS-40-06521

The State of South Carolina,..... Respondent,

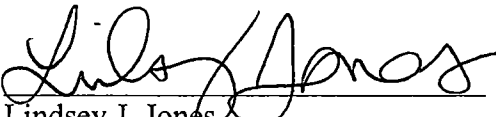
v.

Robert Antonio Guinyard,..... Appellant.

PROOF OF SERVICE

I, the undersigned employee of Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on July 8, 2015, served a copy of the enclosed **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** upon all other parties, through their attorney(s) of record, by depositing copies of the documents in the United States Mail, first class, sufficient postage prepaid, with the return address(es) clearly noted, addressed as follows:

Amie L. Clifford, Esquire
Special Assistant Attorney General
Post Office Box 11549
Columbia, SC 29211


Lindsey J. Jones
Barnes, Alford, Stork & Johnson, LLP
1613 Main Street (29201)
Post Office Box 8448
Columbia, SC 29202
(803) 799-1111

WELDON R. JOHNSON *
DAVID G. WOLFF
KAY GAFFNEY CROWE *
ALAN J. REYNER †
RICHARD C. THOMAS
ROBERT T. STRICKLAND
CURTIS W. DOWLING
MATTHEW G. GERRALD
EMILY COLLINS BROWN
CATHERINE AVA KOPIEC
JENNIFER I. WAXMAN



BARNES ALFORD

Barnes Alford Stork & Johnson L.L.P.

ATTORNEYS AT LAW

OF COUNSEL
WILLIAM C. STORK
ROGER A. WAY, JR.

* CERTIFIED CIVIL
COURT MEDIATOR

† CERTIFIED SPECIALIST
IN TAXATION

RUDOLPH C. BARNES
(1917-1995)
JAMES W. ALFORD
(1930-2008)

July 8, 2015

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Post Office Box 11629
Columbia, SC 29211

RECEIVED
JUL 10 2015
SC Court of Appeals

Re: State v. Guinyard
Appellate Case No. 2012-001203
BASJ File No. 528.20188

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension of Time to File Reply Brief in this matter. Please file the original and six (6) copies of the motion and return one (1) clocked copy in the envelope provided for your convenience. I understand there is no filing fee because this is a criminal matter.

By copy of this letter, I am serving counsel for Respondent with a copy of the motion. Thank you for your assistance in this matter.

With kindest regards, I remain

Very truly yours,

Matthew G. Gerrald

MGG/ljj
Enclosures

cc: Amie L. Clifford, Esquire (*via regular mail*)
Robert M. Dudek, Esquire (*via regular mail*)

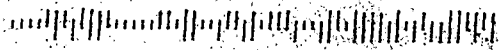
MATTHEW G. GERRALD

1613 MAIN STREET (29201)
POST OFFICE BOX 8448
COLUMBIA, SC 29202

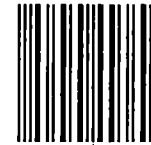


OFFICE: 803.799.1111
FAX: 803.254.1335
MATT@BASJLAW.COM

WWW.BARNESALFORD.COM



1000



29211

U.S. POSTAGE
PAID
COLUMBIA, SC
29201
JUL 08 15
AMOUNT
\$2.08
R2304H109168-25

 **BARNES/ALFORD**

BARNES ALFORD STORK & JOHNSON, LLP

ATTORNEYS AT LAW

1613 MAIN STREET, POST OFFICE BOX 8448
COLUMBIA, SOUTH CAROLINA 29202-8448

RECEIVED

JUL 10 2015

The Honorable Jenny Abbott Kitchinas
South Carolina Court of Appeals
1015 Sumter Street
Post Office Box 11629
Columbia, SC 29211