

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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JUL 21 2015

SC Court of Appeals

Appeal from Lexington County
Honorable Doyet A. Early, III, Circuit Court Judge
Appellate Case Tracking No. 2014-002556

The State,

Appellant,

vs.

Tiffanie Nicole Turner,

Respondent.

**MOTION TO SERVE AND FILE
FINAL BRIEF OF APPELLANT
OUT OF TIME**

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

I.

The Final Brief of Appellant was due to be served and filed July 16, 2015.

II.

Based on an oversight by the undersigned, the due date for the Final Brief was never calendared. As a result, the Brief, while completed, was not timely served and filed. As a result, the State asks the Court to allow it to serve and file the Final Brief of Appellant out of time.

III.

This request is not intended for purposes of delay. The Final Brief of Appellant is being served and filed concomitant with this motion. Accordingly, the State asks the

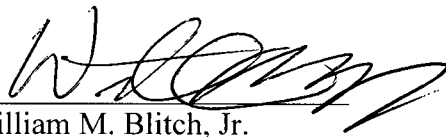
Court to accept the Final Brief of Appellant as served and filed and allow the appeal to proceed.

WHEREFORE, Appellant prays that the Court hold this matter in abeyance until ruling on this motion, allow the service and filing of the Final Brief of Appellant out of time; accept the Final Brief of Appellant as properly served and filed; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

WILLIAM M. BLITCH, JR.
Assistant Attorney General

BY: 
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ATTORNEYS FOR APPELLANT

July 21, 2015

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PROOF OF SERVICE

I, Sally Ellison, certify that I have served the Motion to Serve and File Final Brief of Appellant Out of Time on Respondent by depositing a copy of same in the United States mail, postage prepaid, addressed to:

S. Jahue Moore, Jr., Esquire
Margaret A. Hazel, Esquire
Moore Taylor Law Firm
Post Office Box 5709
West Columbia, South Carolina 29171

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

This 21st day of July, 2015.



SALLY ELLISON
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