

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUL 27 2015

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2014-001871

State of South CarolinaRespondent,

v.


John Barra,Appellant,

**MOTION FOR AN EXTENSION OF TIME TO FILE REPLY TO INITIAL BRIEF OF
RESPONDENT**

Appellant, by and through undersigned counsel, respectfully moves this Honorable Court for an Order granting an extension of time to reply to Initial Brief of Respondent. Appellant's counsel has consulted with Respondent's counsel regarding this motion who indicated no objection to the extension.

Therefore, Appellant requests a 10-day extension from the initial deadline of July 20, 2015 and permission to file reply to Initial Brief of Respondent, making the initial brief due on July 30, 2015. No extension to file reply to Initial Brief of Respondent has been previously granted.

FUTERAL & NELSON, LLC



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email to: tnelson@charlestonlaw.net

Dated: 7/20/15

Attorney for Appellant

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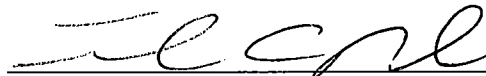
PROOF OF SERVICE

I hereby certify that I have served the *Motion for an Extension of Time to File Reply Brief of Respondent* on the following by facsimile on July 20, 2015 and by United States Mail, postage prepaid, on July 24, 2015, addressed as follows:

Salley W. Elliott, Esquire
Office of Attorney General
Rembert C. Dennis Building
Post Office Building 11549
Columbia, South Carolina 29211-1549

Frances Daniel Austin, Esquire
City of North Charleston Municipal Court
2500 City Hall Lane
Charleston, SC 29406

FUTERAL & NELSON, LLC



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Dated: July 24, 2015

Attorney for Appellant



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1004 Anna Knapp Boulevard
Mount Pleasant, South Carolina 29464

Mailing Address:

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Mount Pleasant, South Carolina 29465

Tel: 843-284-5500 | Fax: 843-284-5501

charlestonlaw.net

July 24, 2015

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SC Court of Appeals

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

Re: State, Respondent v. John Barra, Appellant
Case No.: 2014-001871

Dear Ms. Kitchings:

Please find enclosed an original and one copy of *Motion for an Extension of Time to File Reply Brief of Respondent along with Proof of Service* for the above-referenced matter. Please file the original and return a clocked copy to this office in the envelope provided. Should you have any questions, please feel free to contact our office.

By copy of this letter, I am serving Frances Daniel Austin, Esquire, and Salley W. Elliott, Esquire. Thank you for your attention to this matter.

With kind regards, I am,

Sincerely,

Shaunda M. Smith
Paralegal

/sms

Enclosure(s): As stated

cc: Frances Daniel Austin, Esquire
Salley W. Elliott, Esquire



Futeral & Nelson LLC

Post Office Box 1385
Mount Pleasant, South Carolina 29465



PITNEY BOWES

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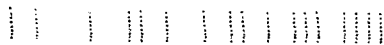
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