

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

**RECEIVED**

JUL 29 2015

The Honorable Robert E. Hood, Circuit Court Judge

**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.

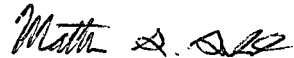
Robert Antonio Guinyard,..... Appellant.

**THIRD MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

Pursuant to Rules 263(b) and 240, SCACR, and Supreme Court Order No. 2009-03-18-01, the undersigned counsel for Appellant respectfully requests a third ten (10) day extension of the deadline for filing Appellant’s Reply Brief. Appellant currently has two motions for extension pending which, if granted, would make the current deadline July 31, 2015. With this third extension, the new deadline would be August 10, 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.

In Appellant's Second Motion for Extension of Time to File Reply Brief, the undersigned stated that he did not, at that time, anticipate requesting any further extensions. However, since filing that motion, another of the undersigned's clients has been placed under a court-ordered discovery deadline of July 31, 2015. Complying with that deadline has taken nearly all of the undersigned's available time. Accordingly, he and his partner, Richard C. Thomas, certify that they believe that the requested extension is warranted and that there is good cause to seek the extension.

The undersigned has consulted with Amie L. Clifford, Esquire, counsel for Respondent, who indicated she has no objection to this request.

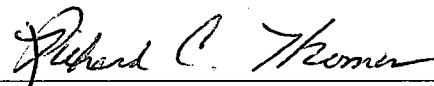


---

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



---

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

July 29, 2015

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM RICHLAND COUNTY  
Court of General Sessions

JUL 29 2015

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 29, 2015, served a copy of the enclosed **THIRD 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

*Debbie J. Raines*

Debbie J. Raines  
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 29, 2015

## VIA HAND DELIVERY

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

RECEIVED

JUL 29 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 Third 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 with our courier. 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/djr  
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