

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

**RECEIVED**

AUG 07 2015

APPEAL FROM LEXINGTON COUNTY  
The Honorable Doyet A. Early, III

SC Court of Appeals

Appellate Case No. 2014-002556

The State, ..... Appellant,

vs.

Tiffanie Nicole Turner, ..... Respondent.

**NOTICE OF MOTION AND MOTION TO ACCEPT RESPONDENT'S FINAL  
BRIEF AND FOR AN EXTENSION OF TIME TO FILE RESPONDENT'S  
FINAL BRIEF**

Respondent Tiffanie Nicole Turner hereby moves for an Order, pursuant to Rule 263(b), SCAR, to allow her to file and serve her Final Brief out of time and/or to enlarge the time for filing of her Final Brief. This motion is made on the following grounds:

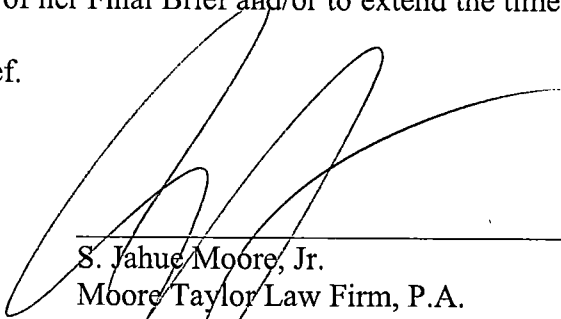
1. On or about June 26, 2015 Appellant served the Record on Appeal on the Respondent.
2. At the time Appellant served the Record on Appeal, Attorney Margaret "Meg" Hazel was handling the above-captioned appeal and in fact had previously filed Respondent's Initial Brief and Designation of Matter on Appellant.
3. Subsequent to June 26, 2015, Ms. Hazel left Moore Taylor Law Firm, P.A. for employment with the South Carolina Department of Education.

4. Due to an in-office miscommunication caused by Attorney Hazel leaving the firm, the undersigned inadvertently missed the deadline to prepare and file Respondent's Final Brief. The undersigned did not learn of this inadvertent oversight until it received correspondence from the Court of Appeals dated August 4, 2015, and received August 7, 2015, indicating Respondent had not filed a Final Brief.

5. The undersigned now seeks leave of this Court to extend the time period for filing of Respondent's Final Brief and to accept filing of the Respondent's Final Brief out of time.

6. This Motion is not made to prejudice the Appellant or unnecessarily delay the appeal in this matter. The undersigned will immediately began working on her Final Brief for service and filing with the Court.

7. For these reasons and any others that may be presented to the Court upon request or at a hearing regarding this motion, the Respondent requests that the Court grant her motion to accept a late filing of her Final Brief and/or to extend the time for her to prepare, file and serve her Final Brief.



---

S. Jahue Moore, Jr.  
Moore Taylor Law Firm, P.A.  
Post Office Box 5709  
West Columbia, South Carolina 29171  
Telephone: 803-796-9160  
Attorneys for Respondent

August 7, 2015

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

AUG 07 2015

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
The Honorable Doyet A. Early, III

Appellate Case No. 2014-002556

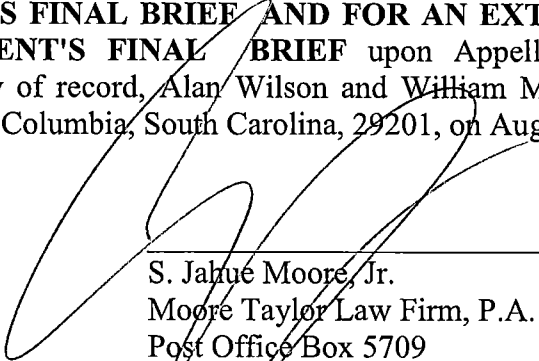
The State, ..... Appellant,

vs.

Tiffanie Nicole Turner, ..... Respondent.

**PROOF OF SERVICE**

I certify that I served the Respondent's **NOTICE OF MOTION AND MOTION TO ACCEPT RESPONDENT'S FINAL BRIEF AND FOR AN EXTENSION OF TIME TO FILE RESPONDENT'S FINAL BRIEF** upon Appellant, by hand delivering a copy to its attorney of record, Alan Wilson and William M. Blitcher, Jr. located at 1000 Assembly Street, Columbia, South Carolina, 29201, on August 7, 2015.

  
S. Jakue Moore, Jr.  
Moore Taylor Law Firm, P.A.  
Post Office Box 5709  
West Columbia, South Carolina 29269  
Telephone: 803-796-9160  
Attorneys for Respondent

August 7, 2015