

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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AUG 10 2015  
SC Court of Appeals

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Appeal from Lexington County  
Thomas A. Russo, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

Respondent,

vs.

BILAL SINCERE HAYNESWORTH,

Appellant.

Appellate Case No. 2014-001177  
\_\_\_\_\_

**MOTION FOR ISSUANCE  
OF ORDER OF TRANSPORTATION  
AND MOTION TO HOLD TIMELINES  
IN ABEYANCE**  
\_\_\_\_\_

Respondent now moves for this Court to issue an Order of Transportation for (1) State's Exhibit # 13 (CD - Exxon surveillance video) and (2) State's Exhibit #18 (Dixon statement to law enforcement) that are necessary to review in order to complete the Respondent's brief. Respondent also now moves to hold all due dates in abeyance pending this Court's issuance of the order:

I.

Respondent will need to view the video and statement prior to complete the briefing in this case as the evidence is relevant to the analysis of the issues raised on appeal.

II.

Respondent also moves to hold the time-lines in abeyance until this Court rules on the State's motion.

III.

WHEREFORE, Respondent prays that this Court issue an Order of Transportation and hold the filing deadlines in abeyance pending resolution of this motion; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

DAVID SPENCER  
Senior Assistant Attorney General

BY:   
DAVID SPENCER

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ATTORNEYS FOR RESPONDENT

August 10, 2015

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**PROOF OF SERVICE**  
\_\_\_\_\_

I, Norma Bigbee, certify that I have served Respondent's Motion For Issuance of Order of Transportation And Motion to Hold Timelines In Abeyance on Appellant's Attorney by depositing a copy of the same in the United States mail, postage prepaid, addressed to Robert M. Pachak, Esquire, SC Commission on Indigent Defense, Division of Appellate Defense, P.O. Box 11589, Columbia, SC 29211.

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

This 10<sup>th</sup> day of August, 2015.

  
\_\_\_\_\_  
Norma Bigbee  
Legal Assistant  
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