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AUG 28 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2013-001953

The State Respondent,

v.

Julia B. Phillips Appellant.

MOTION FOR EXTENSION TO FILE REPLY BRIEF OF APPELLANT

Pursuant to Rule 240, SCACR, Appellant Julia B. Phillips respectfully requests a 30-day extension to file her Reply Brief, currently due to be filed and served on September 4, 2015. This motion is made on the grounds that the undersigned currently has a very heavy workload, including other pro bono matters. Therefore, additional time is needed to prepare and file the Reply Brief. This is Appellant's first request for an extension to file her Reply Brief, and the request is not intended for purposes of delay.

By the undersigned's calculations, the extension, if granted, would extend the deadline for filing the Reply Brief to Monday, October 5, 2015.

The undersigned further requests that the time for filing be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Michael P. Scott
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Robert M. Dudek, Esquire
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Attorneys for Appellant

August 28, 2015

THE STATE OF SOUTH CAROLINA
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APPEAL FROM YORK COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

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The StateRespondent,

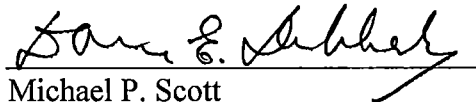
v.

Julia B. Phillips.....Appellant.

PROOF OF SERVICE

I certify that on this 28th day of August, 2015, I have served the foregoing
MOTION FOR EXTENSION TO FILE REPLY BRIEF OF APPELLANT via U.S. Mail,
first class postage prepaid, on the following counsel of record:

Anthony Mabry, Esquire
S.C. Attorney General's Office
P.O. Box 11549
Columbia, SC 29211-1549



Michael P. Scott
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Michael P. Scott
Associate
Admitted in SC

August 28, 2015

BY HAND DELIVERY

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court Of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: *The State v. Julia B. Phillips*
Appellate Case No. 2013-001953

Dear Ms. Kitchings:

The Reply Brief of Appellant in the above-referenced appeal is due to be served and filed by September 4, 2015. Due to a heavy workload, I am requesting a 30-day extension to file the Reply Brief. This is the first extension request in this case, and it is not intended for the purpose of delay.

I appreciate your consideration of this request and ask that you hold the filing time in abeyance during the time in which this request is pending.

By copy of this letter, I am informing counsel for Respondent of this request.

Sincerely yours,

Michael P. Scott
MPS/ksh
Enclosures

cc: Robert Michael Dudek, Esquire
Anthony Mabry, Esquire
Julia B. Phillips

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SC Court of Appeals

Charleston

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Columbia

Greensboro

Greenville

Hilton Head

Myrtle Beach

Raleigh