

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal From Laurens County
The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No: 2014-001299

RECEIVED
SEP 16 2015
SC Court of Appeals

THE STATE.

Respondent,

vs.

DANIEL MARTINEZ HERRERA,

Appellant.

MOTION FOR EXTENSION OF TIME

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to the Court today, pursuant to a previous extension granted by the Court.

II.

Due to work required in other cases pending before this Court and the South Carolina Court of Appeals, I am unable to complete this Brief on time. I would therefore request an extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

III.

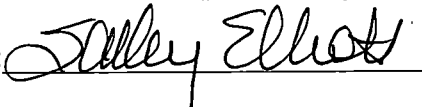
This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared.

WHEREFORE, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of Respondent and Designation of Matter in this case for thirty (30) days; and for such other and further relief as the Court may deem just and proper.

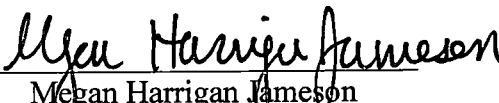
Respectfully submitted,

ALAN WILSON
Attorney General

SALLEY W. ELLIOTT
Senior Assistant Deputy Attorney General

BY: 

MEGAN HARRIGAN JAMESON
Assistant Attorney General

BY: 
Megan Harrigan Jameson
S. C. Bar No: 100108

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ATTORNEYS FOR RESPONDENT

September 16, 2015

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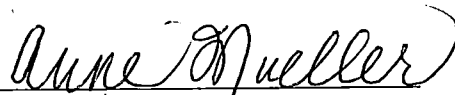
Appellant.

PROOF OF SERVICE

I, Anne Mueller, certify that I have served the Motion for Extension of Time on Appellant by depositing two copies of the same in the United States mail, postage prepaid, addressed to his attorney of record, John H. Strom, Esquire, South Carolina Commission of Indigent Defense, Office of Appellate Defense, P.O. Box 11589, Columbia, South Carolina 29211.

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

This 16th day of September, 2015.



ANNE A. MUELLER
Administrative Assistant
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ALAN WILSON
ATTORNEY GENERAL

September 16, 2015

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SC Court of Appeals

John H. Strom, Esquire
South Carolina Commission of Indigent Defense
Office of Appellate Defense
P.O. Box 11589
Columbia, South Carolina 29211

RE: State v. Daniel Martinez Herrera
Appellate Case No: 2014-001299

Dear Counsel:

Enclosed please find two copies of the Motion for Extension of Time in the above case.

Sincerely,

Megan Harrigan Jameson
Assistant Attorney General
S.C. Bar No: 100108

MHJ/aam
Enclosures

cc: The Honorable Jenny A. Kitchings (w/original and 6 enclosed)
Victim Service