

1st RFB due 10/15/15
New due date 11/16/15

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OCT 20 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Alexander MacCauley, Circuit Court Judge

Appellate Case #: 2015-001099

State of South Carolina, Appellant,

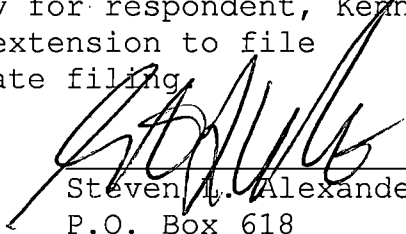
v.

Kenny R. Harris, Respondent.

MOTION TO ALLOW 30 DAY EXTENSION TO FILE INTITAL BRIEF OF
RESPONDENT AND FOR LATE FILING

I, Steven L. Alexander, attorney for respondent, Kenny R. Harris, move to be allowed a 30 day extension to file respondent's initial brief and for late filing.

October 16, 2015



Steven L. Alexander
P.O. Box 618
Pickens, SC 29671
864-898-3208
Attorney for Respondent

Other Counsel of Record:
Mr. David Spencer
Senior Assistant Attorney General
PO Box 11549
Columbia, SC 29211-1549

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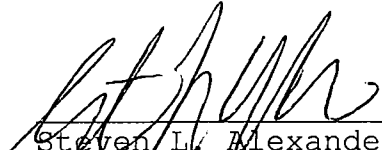
v.

Kenny R. Harris, Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for 30 day extension to file respondents initial brief and to Allow Late Filing on State of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on October 16, 2015, addressed to it's attorney of record, David A. Spencer, PO Box 11549, Columbia, SC 29211-1549.

October 16, 2015


Steven L. Alexander
P.O. Box 618
Pickens, SC 29671
864-898-3208
Attorney for Respondent

Other Counsel of Record:
Mr. David Spencer
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October 16, 2015

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SC Court of Appeals

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211
VIA FAX AND MAIL: 803-734-1839

RE: State of South Carolina v. Kenny Ray Harris
Case#: 2015-001099

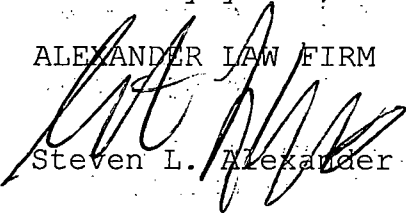
Dear Ms. Kitchings:

I have enclosed a Motion for 30 Extension to file Respondent's initial brief and to Allow Late Filing, along with my Proof of Service and I was appointed on this indigent client's case and understand there is no filing fee. This is based on an heavy work load and not being able to complete this brief in the required time. Also, by error I am 1 day past the initial time to file respondent's brief and just received the enclosed letter in today's (10/16/15) mail informing me that October 15, 2015 was when this brief was due.

Please return filed copies in the enclosed envelope and let me know if this request is granted. Thank you for your cooperation and assistance. If anything further is required please just let me know.

Sincerely yours,

ALEXANDER LAW FIRM


Steven L. Alexander

Enclosure

cc: Mr. David Spencer
Senior Assistant Attorney General
PO Box 11549
Columbia, SC 29211-1549
VIA FAX AND MAIL: 803-253-6283