

(S)

2nd AIB due 10/14/15
new due date 11/13/15

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
OCT 13 2015
SC Court of Appeals

Appeal from Fairfield County
Court of Common Pleas
The Honorable Clifton Newman, Circuit Court Judge

STATE,

APPELLANT,

V.

KATHRYN H. DEW,

RESPONDENT

CASE NO. 2014-CP-20-0255

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF RESPONDENT

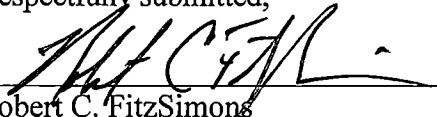
The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

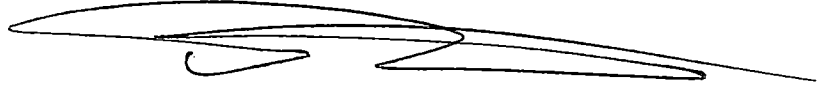
1. The initial brief of respondent in this case is due to be served and filed on October 14th, 2015.
2. The only previous filing by the Respondent in this case is the first request for extension, which was granted by the Court.
3. This request is made in good faith, and not for purposes of delay. Counsel was delayed by severe weather problems which caused closures, power outages, disaster prevention measures, all which greatly limited the time available to work on the case, and which was beyond the control of Counsel. Counsel intends to continue to work on the cases with more than two

extensions first so that the caseload will hopefully become more manageable in the near future, and fewer extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the initial brief of respondent be held in abeyance pending a ruling on this motion.

Respectfully submitted,


Robert C. FitzSimons
Attorney for the Respondent
Sixth Circuit Public Defender's Office
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Columbia, SC 29205
(803) 815-4074


Ross A. Burton
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October 14th, 2015

SIXTH CIRCUIT PUBLIC DEFENDER'S OFFICE
FAIRFIELD OFFICE
P.O. Box 637
Winnsboro, South Carolina 29180
(803) 815-0796

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OCT 13 2015

SC Court of Appeals

Via hand delivery

October 14th, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: The State vs. Kathryn H. Dew
Appeal from Fairfield County
The Honorable Clifton Newman
C/A 2014-CP-20-0255
Appellate Case No. 2015-001093

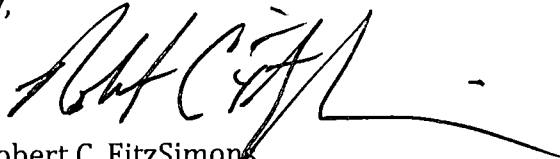
Dear Ms. Kitchings:

Enclosed, please find enclosed a petition for extension to be filed in the above matter.

I have served a copy of the petition upon the Appellant.

Thank you for your attention to this matter.

Sincerely,



Robert C. FitzSimons
Attorney for the Respondent

RCF/rab

Cc: Marcus K. Gore, Esq.