

**THE SOUTH CAROLINA COURT OF APPEALS**

**Appellate Case No. 2015-001171**

**APPEAL FROM CHARLESTON COUNTY**

**RECEIVED**

OCT 30 2015

SC Court of Appeals

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**THE STATE**

**vs.**

**PHILIP SIMONEAUX, a/k/a  
PHILLIP GERALD SIMONEAUX**

**Appellant.**

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**MOTION TO EXTEND FILING OF RECORD ON APPEAL**

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Now comes the Appellant who respectfully moves the Court as follows:

1. To extend the time for Filing The Record on Appeal until November 24, 2015 for the following reasons:
  - A. The Appellant requested the Transcript in a timely fashion.
  - B. The Transcript was posted to Counsel on August 20, 2015.
  - C. The Appellant had previously moved for partial remand which this Court subsequently denied but the conditions necessitating the request persisted and remain today.
  - D. Contemporaneously Counsel was representing one Jimmy Harris in a Multi-Defendant Drug Conspiracy which ultimately came to fruition during this time frame. (U.S. v. Ballard Et al 2:12-232)

**AND IT IS SO MOVED THIS 27<sup>TH</sup> DAY OF October, 2015 AT CHARLESTON,  
SOUTH CAROLINA.**

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

5712 S. DICKINSON DRIVE

CHICAGO, ILL. 60637

OFFICE OF THE DEAN

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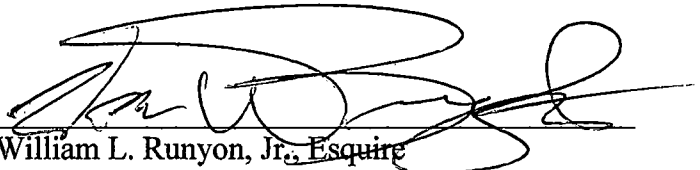
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A handwritten signature in black ink, appearing to read "William L. Runyon, Jr.", written over a horizontal line.

William L. Runyon, Jr. Esquire  
#3 Gamecock Avenue, Suite 303  
Charleston, SC 29407  
SC Bar No.: 4838  
(843) 571-3515

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PHILLIP GERALD SIMONEAUX**

**Appellant.**

---

**CERTIFICATION OF RECEIPT**

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This is to certify that the Record was received August 24, 2015.



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William L. Runyon, Jr., Esquire  
#3 Gamecock Avenue, Suite 303  
Charleston, SC 29407  
SC Bar No.: 4838  
(843) 571-3515

STATE OF SOUTH CAROLINA )  
COUNTY OF CHARLESTON )

THE STATE, )

Vs. )

PHILIP SIMONEAUX, a/k/a )  
PHILIP GERALD SIMONEAUX )  
Defendant. )

IN THE COURT OF APPEALS  
Appellate Case No.: 2015-001171

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SC Court of Appeals

**CERTIFICATE OF MAILING**

I William L. Runyon, Jr., Esquire, do hereby certify that on the 28<sup>th</sup> day of October, 2015, I served a copy of the **MOTION TO EXTEND FILING OF RECORD ON APPEAL** and **CERTIFICATION OF RECEIPT** on the Honorable Matthew Buchanan—Department of Probation, Parole & Pardon in the within matter, by mailing copies to each of them by way of the United States Mail, with sufficient postage attached thereto and addressed as follows:

Honorable Matthew Buchanan  
General Counsel  
Department of Probation, Parole & Pardon  
P. O. Box 50666  
Columbia, SC 29250



William L. Runyon, Jr., Esquire  
#3 Gamecock Avenue, Suite 303  
Charleston, SC 29407  
SC Bar No.: 4838  
(843) 571-3515

Dated this 28<sup>th</sup> day of October, 2015  
in Charleston, South Carolina.

⑤  
**William L. Runyon, Jr.**

**Attorney At Law**

#3 Gamecock Avenue, Suite 303  
Charleston, SC 29407

Telephone: (843) 571-3515 Facsimile: (843) 766-5085

**RECEIVED**

OCT 30 2015

SC Court of Appeals

October 28, 2015

Honorable Jenny Kitchens  
Clerk of South Carolina Court of Appeals  
1015 Sumter Street  
P. O. Box 11629  
Columbia, SC 29211

RE: State of South Carolina v. Philip Simoneaux, a/k/a Philip Gerald Simoneaux  
Appellate Case No.:2015-001171

Dear Ms. Kitchens:

Enclosed please find **MOTION TO EXTEND FILING OF RECORD ON APPEAL** together with **CERTIFICATE OF MAILING** in the above referenced matter. Please file originals and return certified copies to me in the stamped-self addressed envelope for your convenience.

Thanking you, I remain

Sincerely,

  
William L. Runyon, Jr.

WLR, JR. / bb

Enclosure

Cc: Honorable Matthew Buchanan