

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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**RECEIVED**

OCT 16 2015

APPEAL FROM Horry COUNTY  
KRESTI LEA HARRINGTON, CIRCUIT COURT JUDGE

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S.C. SUPREME COURT

JEFFREY WAYNE RIEBE,

PETITIONER

v

STATE OF SOUTH CAROLINA,

RESPONDENT,

APPELLATE CASES NO: 2015-000015

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MOTION FOR ENLARGEMENT  
PETITIONER'S RESPONSE TO JOHNSON BRIEF

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MOTION FOR ENLARGEMENT  
PETITIONER, PRO SE. RESPONSE TO  
COUNSEL'S JOHNSON BRIEF

Come now, Jeffrey Riebe, Petitioner, PRO SE, RE-PRESENTED by MR. David Alexander of the South Carolina Commission of Indigent Defense, Division of Appellate Defense, Columbia South Carolina, Petitioner Present before this Honorable Court, a PRO SE, MOTION to respectfully move this Court for an ENLARGEMENT of time of ninety (90) days

1) This is Petitioner's first request for ENLARGEMENT of time to file his response to Counsel Johnson Brief.

2) Petitioner is PRO SE for this Johnson Brief very little training in Law and no training in writing Briefs.

3) Petitioner has a extreme difficulty in writing

4) Petitioner take several classes and is involved in other activities.

5) The Correctional Institution has had several events that interfered with preparation of Petitioner Brief

6) Petitioner current deadline is October 17, 2015 for filing his response to Johnson Brief. Petitioner request an ENLARGEMENT of time until January 15, 2016 to file his response to Counsel's Johnson Brief.

7) This motion is made in the interest of Justice, and not meant to delay the proceeding to make sure Petitioner is fully heard. The State of South Carolina will not be prejudiced by a ninety (90) days delay.

Wherefore, based on the above, Jeffrey Riebe urges this Honorable Court to grant him a ninety (90) day ENLARGEMENT of time ~~to~~ to January 15, 2016 to file his response to Counsel JOHNSON Brief.

Sworn and subscribed before me

me J. Frankles

on 13 OCT. 2015

my commission expires on

12-16-2019

Jeffrey Riebe  
Jeffrey Riebe

# Affidavit of Service

I, Jeffrey Riebe did mail to:

ALLEN WILSON

ATTORNEY GENERAL

JOSHUA L. THOMAS

ASSISTANT ATTORNEY GENERAL

P.O. Box 11549

Columbia, SC 29211

by mail on day sworn and subscribed

Jeffrey Riebe  
Jeffrey Riebe

Sworn and subscribed before

me J.C. Frankler

on 13 Oct 2015

My commission expires

on 12-16-2019

Jeffrey Meebe 177357

McCormick Correctional Institute  
386 Redemption Way  
McCormick, SC 29899

Wright SOUTH CAROLINE SUPREME COURT