

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

DEC 18 2015

SC Court of Appeals

Appeal from Beaufort County
Honorable Maite Murphy, Circuit Court Judge
Appellate Case Tracking No. 2013-002090

The State,

Respondent,

vs.

Stanley Wright,

Appellant.

**MOTION OUT OF TIME FOR SECOND EXTENSION
TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER**

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

I.

The Initial Brief of Respondent and Designation of Matter were due to be served and filed December 14, 2015. However, due to an oversight by the undersigned, the due date was not properly calendared. As a result, the State asks this Court to accept this motion for second extension out of time.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the Respondent moves for a second extension in the above referenced appeal. Due to work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this Brief on time. Further, the

undersigned has completed several briefs and Returns to Petition for Writ of Certiorari in the last several weeks. In addition, counsel has participated in oral arguments at this Court and the South Carolina Supreme Court.

III.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. I would therefore request a second extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

WHEREFORE, Respondent prays that the Court accept this motion out of time; hold this matter in abeyance until ruling on this motion; 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 from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

WILLIAM M. BLITCH, JR.
Assistant Attorney General

BY:



William M. Blitch, Jr.

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR RESPONDENT

December 18, 2015

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

RECEIVED

DEC 18 2015

Appeal from Beaufort County
Honorable Maite Murphy, Circuit Court Judge
Appellate Case Tracking No. 2013-002090

SC Court of Appeals

The State,

Respondent,

vs.

Stanley Wright,

Appellant.

PROOF OF SERVICE

I, Sally Ellison, certify that I have served the Motion Out of Time for Second Extension to Serve and File Initial Brief of Respondent and Designation of Matter on Appellant by depositing a copy of same in the United States mail, postage prepaid, addressed to:

C. Andrew Carroll, Esquire
Carroll Law Firm, LLC
44 Markfield Drive, Suite C
Charleston, South Carolina 29407

Valerie V. Vie, Esquire
Soyna Chachere-Compton, Esquire
5682 Palazzo Way, Suite 102
Douglas, Georgia 30134

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

This 18th day of December, 2015.



SALLY ELLISON
Office of Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3727



ALAN WILSON
ATTORNEY GENERAL

RECEIVED
DEC 18 2015
SC Court of Appeals

December 18, 2015

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: State v. Stanley L. Wright
Appellate Case Tracking No. 2013-002090

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion Out of Time for Second Extension to Serve and File Initial Brief of Respondent and Designation of Matter along with proof of service for filing in the above-referenced appeal.

Sincerely,

William M. Blich, Jr.
Assistant Attorney General

Enclosures

cc: C. Andrew Carroll, Esquire
Valerie V. Vie, Esquire
Victim Services