

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions
Edward M. Miller, Circuit Court Judge

DEC 16 2015
SC Court of Appeals

Appellate Case No. 2013-000149

State of South Carolina, Respondent,
v.
Raymond Young, Appellant.

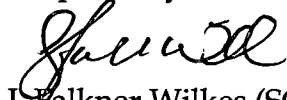
MOTION

Appellant moves to extend the time to file the Appellant's Initial Brief and Designation of Matter.

Due to the current case load of counsel and the size of the record in this case the Appellant's Initial Brief has not been completed. Counsel is presently completing the briefing in the Fourth Circuit case No. 14-7297. In addition to federal and state appellate matters Counsel has been engaged in numerous client related matters that have caused delay in the completion of this brief. Additional time is therefore necessary to fully research and brief the issues in this case.

Wherefore, Appellant moves for an additional thirty days in which to serve and file the Appellant's Initial Brief in this case.

Respectfully submitted,



J. Falkner Wilkes (SC Bar #12893)
114 Whitsett Street
Greenville, SC 29601
Counsel for Appellant

December 14, 2015.

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CERTIFICATE

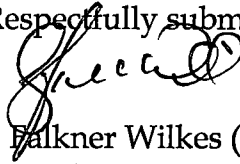
I certify that on December 14, 2015, I served the Appellant's Motion for an extension of time in which to file the Appellant's Initial Brief and Designation of Matter by placing a copy of same in the United States Mail, first class postage prepaid, addressed to counsel for the Respondent, and others as indicated below:

Salley W. Elliott
Office of the Attorney General
P.O. Box 11549
Columbia, S.C. 29211
Appellate Attorney for Respondent

Jenny Abbott Kitchings
Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

Raymond Young, 309604
Lee Correctional Institution
990 Wisacky Highway
Bishopville, SC 29010

Respectfully submitted,



J. Falkner Wilkes (SC Bar #12893)

114 Whitsett Street

Greenville, SC 29601

(864) 282-1292

(864) 271-6035 (facsimile)

Counsel for Appellant

December 14, 2015.

J. FALKNER WILKES

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Greenville, South Carolina 29601

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Jenny Abbott Kitchings
Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

Re: State v. Raymond Young, Appellate Case No.: 2013-000149

Dear Ms. Kitchings,

I show the Initial Brief and Designation of the Appellant due today. Due to my current caseload and the size of the record in this case, I still have not completed my work on the brief. I am now completing a federal brief and will work on completing Mr. Young's brief after the filing of the federal brief.

I have enclosed a motion for an extension of time along with a certificate of service.

Sincerely,

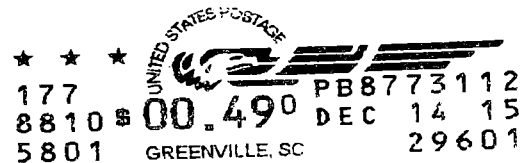


J. Falkner Wilkes

c.
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Clerk of Court
1015 Sumter Street
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