

THE STATE OF SOUTH CAROLINA

In The Supreme Court

APPEAL FROM CHESTERFIELD COUNTY  
Court of General Sessions

J. Michael Baxley, Circuit Court Judge

Appellate Case No. 2015-000606

**RECEIVED**

JAN 12 2016

**SC SUPREME COURT**

The State of South Carolina.....Petitioner,

v.

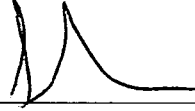
Graham Franklin Douglas ..... Respondent.

**MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney for Respondent Graham Franklin Douglas moves for an extension of the deadline for serving and filing the Respondent’s Brief in the above-captioned case. The Respondent’s Brief is due with the Court on Wednesday, January 13, 2016. A thirty (30) day extension to file the Respondent's Brief, if granted, will extend the filing deadline to February 12, 2016.

At present, counsel is under an unusually heavy work schedule, and will be unable to complete the Return by the January 13, 2016 deadline. Accordingly, counsel respectfully moves for a thirty (30) day extension in which to file the Respondent’s Brief. If granted, the new deadline for filing the Return will be February 12, 2016.

Respectfully submitted,



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Attorney for Respondent Graham Douglas

West Columbia, South Carolina

January 12, 2016

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The State of South Carolina.....Petitioner,

v.

Graham Franklin Douglas ..... Respondent.

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PROOF OF SERVICE

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I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, certify that I have served the Respondent's Motion for Extension of Time on the parties listed below by depositing a copy in the United State Mail, first class postage prepaid, on January 12, 2016, addressed as indicated below.

Alan Wilson  
John W. McIntosh  
Alphonso Simon, Jr.  
SC Attorney General's Office  
P.O. Box 11549  
Columbia, SC 29211

Ernest A. Finney, III  
Solicitor, Third Judicial Circuit  
P.O. Box 836  
Sumter, SC 29150-0836

  
Lynn G. Ivey

West Columbia, South Carolina  
January 12, 2016