



THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JAN 14 2016
SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
General Sessions Court
John C. Hayes, III, Judge

Appellate Case No. 2015--001810

State of South Carolina.....Respondent,

vs.

Marquez D. Glenn.....Appellant.

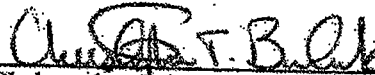
MOTION FOR EXTENSION OF TIME TO FILE

Appellant hereby moves the Court for a Thirty (30) day extension of time in which for Appellant to file his Initial Brief and the Designation of Matter to be Included in the Record on Appeal. This Motion is is being made in good faith and for good cause as the issue that is central to this appeal is a question of first impression in the State of South Carolina and has been the subject of developing judicial and academic analyses. Accordingly, as an issue of first impression, this Appeal is requiring extensive research to properly and appropriately present this issue to the Court. This Motion is not interposed for purposes of delay, but is necessary for the appropriate development of the Appeal. As evidenced by the email correspondence attached

hereto, Counsel for Appellant has spoken with Interim Senior Assistant Deputy Attorney General Ben Aplin who has consented to Appellant's Motion for Extension of Time to File.

Respectfully submitted,

BRUMBACK & LANGLEY, LLC



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Attorneys for Appellant Marquez D. Glenn

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PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to File on Respondent, State of South Carolina, by electronic mail on January 14, 2016, addressed to Interim Senior Assistant Deputy Attorney General Ben Aplin at haplin@scag.gov.

January 14, 2016

BRUMBACK & LANGLEY, LLC

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SC Court of Appeals

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GENERAL & COMPLEX LITIGATION
BUSINESS & CORPORATE LAW
APPELLATE PRACTICE
CRIMINAL DEFENSE
REAL ESTATE

January 13, 2016.

VIA FACSIMILE & FIRST CLASS MAIL

Ms. Jenny Abbott Kitchings

P.O. Box 11629

Columbia, SC 29211

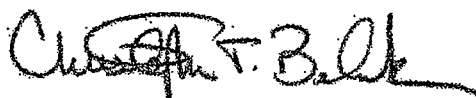
Re: *The State v. Marquez Glenn*
Appellate Case No.: 2015-001810

Dear Ms. Kitchings:

Enclosed herewith, please find Appellant's Motion for Extension of Time to File. I have faxed a copy of the Motion to your office as well as depositing a copy in the United States Mail. If you have any questions or require anything else from my office, please do not hesitate to contact me at (864) 414-9097.

With kindest regards, I am

Truly yours,



Christopher T. Brumback, Esq.
Brumback & Langley, LLC

CTB/ctb

CC: Ben Aplin (via email)

Enclosures (2)

FAX COVER SHEET

TO	
COMPANY	
FAXNUMBER	18037341839
FROM	Brumback and Langley, LLC
DATE	2016-01-14 15:20:18 GMT
RE	Re: Appellate Case No. 2015-001810

COVER MESSAGE

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SC Court of Appeals

General & Complex Litigation, Criminal Defense, Family Law, and Real Estate

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