

THE STATE OF SOUTH CAROLINA

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In the Court of Appeals

JAN 19 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.

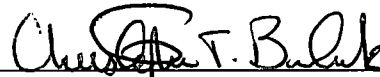
**MOTION FOR EXTENSION OF TIME TO FILE**

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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Spencer D. Langley / S.C. Bar No. 77898  
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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 baplin@scag.gov.

January 14, 2016

BRUMBACK & LANGLEY, LLC

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Attorneys for Appellant Marquez D. Glenn

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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

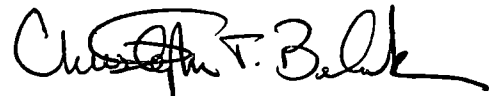
Re: *The State v. Marquez Glenn*  
*Appellate Case No.: 2015-001810*

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)

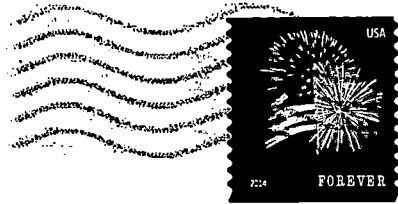


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**SC Court of Appeals** **Ms. Jenny Abbott Kitchings**  
South Carolina Court of Appeals  
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