

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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FEB 08 2016

APPEAL FROM BEAUFORT COUNTY
Court of General Sessions

SC Court of Appeals

Thomas W. Cooper, Jr., Circuit Court Judge

Appellate Case No. 2015-000508
Trial Court Case No. 2012GC0701932

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SC Court of Appeals

The State,

Respondent,

v.

Aaron Scott Young, Jr.,

Appellant.

APPELLANT'S MOTION FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF

NOW COMES Appellant Aaron Scott Young, Jr. ("Appellant") by and through his undersigned counsel, and respectfully moves the Court pursuant to Rule 224, SCACR, for a thirty day extension of time to and including March 11, 2016, to file and serve his Initial Brief and Designation of Matter to be Included in the Record of Appeal in this case. In support thereof Appellant shows the Court the following:

1. The undersigned requested and were granted an extension to file Appellant's Initial Brief and Designation of Matter until February 10, 2016.

Appellant also received one earlier extension requested prior to the undersigned's assignment to this case as Appellant's pro bono appellate counsel.

2. Appellant's time for filing and serving his Initial Brief and Designation of Matter to be Included in the Record of Appeal under the prior extension has not expired.

3. Counsel for Appellant needed to obtain trial exhibits from the Beaufort County Clerk of Court and had difficulty obtaining same.

4. Counsel for Appellant had difficulty scheduling a meeting with the client with the Lieber Correctional Institution.

5. Counsel for Appellant met with the client on February 1, 2016, at which time the client raised additional issues he wants counsel to examine and consider as potential appellate issues.

6. Additionally, counsel for Appellant has had unexpected demands from other clients.

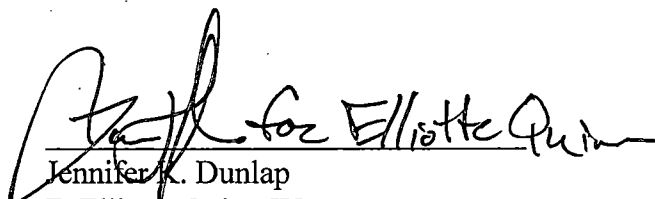
7. Appellant needs additional time in order to prepare his Initial Brief and Designation of Matter to be included in the Record on Appeal.

8. A thirty day extension of time for Appellant to file his Initial Brief and Designation of Matter to be included in the Record on Appeal will serve the interests of justice by allowing counsel adequate time to prepare a thorough and detailed brief in this case.

9. Appellant does not request this extension for the impermissible purpose of delay.

WHEREFORE, Appellant Aaron Scott Young, Jr. respectfully moves the Court for a thirty day extension of time to and including March 11, 2016, to file and serve the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

February 8, 2016



Jennifer K. Dunlap
F. Elliotte Quinn IV
Parker, Poe, Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
(843) 727-2650
Attorneys for Appellant

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CERTIFICATE OF SERVICE

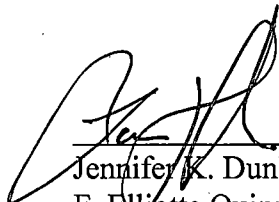
The undersigned certifies on February 8, 2016, he/she caused a copy of the foregoing Appellant's Motion for Extension of Time to File Initial Brief to be served on all parties of record by placing copies in the U.S. Mail, first class, postage prepaid, and addressed as follows:

Alan McCrory Wilson, Esq.
S.C. Attorney General's Office
PO Box 11549
Columbia, SC 29211

Susan Barber Hackett, Esq.
S.C. Commission on Indigent Defense
Division Of Appellate Defense
PO Box 11589
Columbia, SC 29211

Salley W. Elliott, Esq.
S.C. Department of Corrections
PO Box 21787
Columbia, SC 29221

Robert M. Dudek, Esq.
Chief Appellate Defender
1330 Lady Street, Suite 401
Columbia, SC 29201



for F. Elliott Quinn IV

Jennifer K. Dunlap
F. Elliott Quinn IV
Parker, Poe, Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
(843) 727-2650
Attorneys for Appellant



F. Elliott Quinn IV
Associate
Telephone: 843.727.6315
Direct Fax: 843.727.2680
elliottquinn@parkerpoe.com

Charleston, SC
Charlotte, NC
Columbia, SC
Raleigh, NC
Spartanburg, SC

February 8, 2016

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

Re: State v. Aaron Young, Jr.
Appellate Case No. 2015-000508

Dear Ms. Kitchings:

Counsel for Appellant Aaron Young respectfully requests an additional thirty days to file Appellant's initial brief. The requested extension, if granted, would make Appellant's initial brief due on March 11, 2016.

We appreciate your understanding, and please do not hesitate to contact me if you have any questions.

Sincerely,


Elliott Quinn

FEQiv/tlr

cc: Robert M. Dudek, Esq.
Salley W. Elliott, Esq.
Alan McCrory Wilson, Esq.
Susan Barber Hackett, Esq.
Jacqueline Orr (via email jorr@sccourts.org)