

2nd AFB due 2/16/16

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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

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FEB 12 2016

SC Court of Appeals

Appellate Case No. 2015--001810

State of South Carolina.....Respondent,

vs.

Marquez D. Glenn.....Appellant.

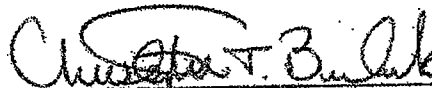
MOTION FOR EXTENSION OF TIME TO FILE

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 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 Counsel has continued the research and drafting process the issues central to the proper presentation of this novel issue of law has further expanded the breadth of research essential and necessary to this appeal. Despite the depth of the issue at hand, Counsel for Appellant is confident that the extension hereby

requested will be sufficient for completion of the research and drafting process. 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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chris@brumbacklangley.com  
spencer@brumbacklangley.com  
Attorneys for Appellant Marquez D. Glenn

From: Ben Aplin [baplin@scag.gov](mailto:baplin@scag.gov)  
Subject: RE: State v. Glenn - Extension Email  
Date: February 12, 2016 at 10:03 AM  
To: Christopher Brumback, [chris@brumbacklangley.com](mailto:chris@brumbacklangley.com)



Of course Chris. As we discussed, the State has no objection to your extension request. Have a great weekend.

**J. Benjamin Aplin**  
Interim Senior Assistant Deputy Attorney General

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From: Christopher Brumback [<mailto:chris@brumbacklangley.com>]  
Sent: Friday, February 12, 2016 10:02 AM  
To: Ben Aplin  
Subject: State v. Glenn - Extension Email

Ben,

Hope you're doing well this morning. I am trying to send out the Motion for Extension today and would like to include an email from you confirming the State's consent to the Motion. Accordingly, when you have a moment this morning, would you mind responding to my email from yesterday confirming your consent.

Thanks,

Chris

**Brumback & Langley, LLC**

Attorneys and Counselors at Law  
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**General & Complex Litigation, Criminal Defense, Family Law, and Real Estate**

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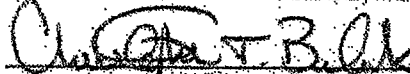
Marquez D. Glenn.....Appellant.

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 February 12, 2016, addressed to Interim Senior Assistant Deputy Attorney General Ben Aplin at [baplin@scag.gov](mailto:baplin@scag.gov).

February 12, 2016

BRUMBACK & LANGLEY, LLC



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Attorneys for Appellant Marquez D. Glenn

**FAX COVER SHEET****TO****COMPANY****FAXNUMBER** 18037341839**FROM** Brumback and Langley, LLC**DATE** 2016-02-12 16:10:43 GMT**RE** Attn:BrandonHall**COVER MESSAGE**

Brumback & Langley, LLC  
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**FAX COVER SHEET**

TO

COMPANY

FAXNUMBER 18037341839

FROM Brumback and Langley, LLC

DATE 2016-02-12 16:10:43 GMT

RE Attn: Brandon Hall

**COVER MESSAGE**

--  
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