

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Honorable R. Markley Dennis, Jr., Circuit Court Judge
Appellate Case Tracking No. 2015-000051

THE STATE,

Respondent,

v.

TRACY WHEELER STUBBLEFIELD AND
AAAA BAIL BONDING AND FORSTER
IDEMNITY COMPANY, SURETIES,

Appellants.

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MAR 04 2016
SC Court of Appeals

**MOTION FOR SECOND EXTENSION TO FILE INITIAL BRIEF OF
RESPONDENT AND DESIGNATION OF MATTER**

Respondent, State of South Carolina, hereby moves for a second extension of time to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. In support of this motion, Respondent submits the following.

1. The Initial Brief of Respondent and Designation of Matter are due to be filed and served March 4, 2016, pursuant to a first extension. Respondent requests a second 30-day extension to serve and file these documents, which is not made for the purpose of delay, but due to counsel's significant absences from the office relating to a work related injury. Counsel is on medically required work restriction, and is only able to work a few hours per day when possible.

2. Counsel has worked on the Initial Brief and Designation in this matter, but was not able to complete it prior to the due date. Counsel assures the Court completion of this brief is a high priority, and she will work diligently to complete it.

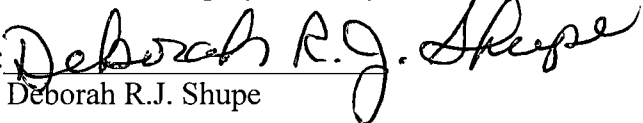
3. The undersigned consulted with counsel for the Appellant, and she is authorized to advise the Court he consents to the requested relief.

Based on the foregoing, Respondent respectfully requests that this Court grant a second 30-day extension in which to file the Initial Brief of Respondent and Designation of Matter, and that all deadlines be held in abeyance pending resolution of this motion.

Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

BY: 
Deborah R.J. Shupe

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR RESPONDENT

March 4, 2016

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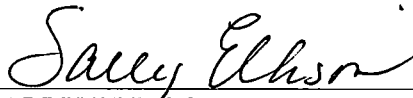
PROOF OF SERVICE

I, Sally Ellison, certify that I have served the Motion for Second Extension to File the Initial Brief of Respondent and Designation of Matter, on Appellants by depositing a copy of same in the United States mail, postage prepaid, addressed to:

Lewis F. Gossett, Esquire
1340 Bull Street
Columbia, SC 29201

I further certify that all parties required by Rule to be served have been served.

This 4th day of March, 2016.



SALLY ELLISON
Office of Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3727



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SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

March 4, 2016

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: The State v. Tracy Stubblefield, AAAA Bail Bonding, et. al.
Appellate Case No. 2015-000051

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion for Second Extension to File Initial Brief of Respondent and Designation of Matter, along with proof of service for filing, in the above-referenced appeal.

Sincerely,

Deborah R.J. Shupe
Senior Assistant Deputy Attorney General

DRJS/sbe
Enclosures

cc: Lewis F. Gossett, Esquire
Victim Services