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March 28, 2016

South Carolina Supreme Court Clerk of Court
P.O. Box 11330
Columbia, SC 29211

RECEIVED

MAR 30 2016

RE: Melinda Richmond v. State of South Carolina
Case No.: 2013-CP-40-00233
Appellate Case No.: 2015-001289

S.C. SUPREME COURT

Dear Honorable Clerk:

Enclosed please find Appellant, Melinda Richmond's, Motion for an Extension of Time in connection with the above-referenced case. Please file the original and return the clocked copy to our office in the envelope enclosed.

Should you have any questions, please contact our office.

Sincerely,

William M. Saltzman
Attorney at Law

Enclosure

cc: Melinda Richmond
J. Clayton Mitchell, Esq.

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

MAR 30 2016

Brooks P. Goldsmith, Circuit Court Judge

S.C. SUPREME COURT

Case No. 2013-CP-40-00233

Melinda Richmond, #331874,

Appellant,

v.

State of South Carolina,

Respondent.

APPELLATE CASE NO. 2015-001289

MOTION FOR EXTENSION OF TIME

Appellant, Melinda J. Richmond, respectfully requests this Court to grant an extension of time to file a Writ of Certiorari. As grounds for this Motion, Appellant states as follows:

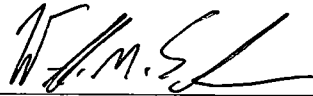
1. A Notice of Appeal was filed on June 17, 2015 regarding Case No. 2013-CP-40-00233.
2. The Division of Appellate Defense then assumed representation of the instant appeal.
3. The South Carolina Supreme Court issued an order on February 18, 2016 relieving the Division of Appellate Defense due to a conflict of interest in handling the appeal:
4. The February 18, 2016 order appointed the undersigned counsel to represent Appellant. The Division of Appellate Defense was also ordered to remain associated with the case for the limited purpose of paying for any necessary transcripts and providing copies of the petition, appendix and briefs.
5. The February 18, 2016 order did not offer a new due date for the Petition for Writ of Certiorari.
6. The Division for Appellate Defense did not provide the undersigned counsel with the Appendix until March 23, 2016.

7. This Court subsequently notified the undersigned counsel on March 25, 2016 that the due date for the Writ of Certiorari was March 18, 2016.

8. An extension of time to file the Writ of Certiorari is proper because the February 18, 2016 order appointing the undersigned counsel did not provide a new due date to file the Writ of Certiorari, the undersigned counsel was recently appointed, the undersigned counsel did not receive the Appendix until March 25, 2016 and the undersigned counsel has not previously requested any extensions of time for filing the Petition for Writ of Certiorari.

WHEREFORE, Appellant respectfully requests this Court to grant a thirty (30) day extension of time to file the Petition for Writ of Certiorari.

March 28, 2016



William M. Saltzman
Merritt, Webb, Wilson & Caruso, PLLC
Post Office Box 24109
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Attorney for Appellant

Other Counsel of Record:
Alan Wilson, Attorney General
J. Clayton Mitchell, Assistant Attorney General
Post Office Box 11549
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Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

Case No. 2013-CP-40-00233

RECEIVED

MAR 30 2016

S.C. SUPREME COURT

Melinda Richmond, #331874,

Appellant,

v.

State of South Carolina,

Respondent.

APPELLATE CASE NO. 2015-001289

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on the Respondent by depositing a copy of it in the United States Mail, postage prepaid on March 28, 2016, addressed to Respondent's attorney of record, Alan Wilson and J. Clayton Mitchell, Post Office Box 11549, Columbia, SC 29211.

March 28, 2016



William M. Saltzman
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Attorney for Appellant




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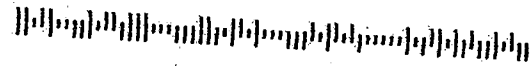
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