

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
Honorable Robin B. Stilwell, Circuit Court Judge
Appellate Case No. 2014-002317

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APR 14 2016

SC Court of Appeals

MARIA MOYAO,

APPELLANT,

vs.

THE STATE,

RESPONDENT.

**APPELLANT'S MOTION FOR FIRST EXTENSION OF TIME
WITHIN WHICH TO SERVE AND FILE THE FINAL BRIEF**

Appellant ("Maria Moyao") through her undersigned counsel, would respectfully show unto the Court as follows:

I.

The Final Brief of Appellant was due to be served and filed March 21, 2016. However, it was brought to the attention of Appellant by the Respondent prior to said date that the Record on Appeal inadvertently included material that that had been stricken earlier from the Designation of Matter and should not have been included in the submitted Record on Appeal. Further, Respondent notified Appellant that it intended to amend its own Designation of Matter, and to file a motion requesting the same, also allowing Appellant to correct its error, and to hold all timelines in abeyance pending this Court's consideration of Respondent's motion. The undersigned counsel apologizes for

the lateness of this request, as Appellant believed Respondent's motion had been filed, staying such deadlines and intending to get the Record on Appeal in proper order.

Appellant is informed and believes that Respondent's motion referencing these corrections has now been filed with the Court.

II.

This extension request is not intended for purposes of delay, but rather to ensure that the Appeal is properly prepared and submitted. Specifically, this request is to ensure Appellant's Final Brief references the Record on Appeal correctly and is not found to be untimely. Appellant would therefore ask this Court to accept the Appellant's motion for an extension of time and grant an extension of time within which to submit the Final Brief of Appellant.

WHEREFORE, Appellant prays that the Court grant the Appellant's Motion for First Extension of Time Within Which to Serve and File the Final Brief of Appellant in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

By: 

DANIEL J. FARNSWORTH, JR.
SC Bar Number: 6922
Attorney for Appellant
Farnsworth Law Offices, LLC
211 Pettigru Street
Post Office Box 8719
Greenville, South Carolina 29604
Telephone (864) 250-9119
Facsimile (864) 250-9120
Dan@FarnsworthLawOffices.com

April 11th, 2016

FARNSWORTH LAW OFFICES, LLC

ATTORNEYS AND COUNSELORS AT LAW

2 WILLIAMS STREET
POST OFFICE BOX 8719
GREENVILLE, SOUTH CAROLINA 29604

DANIEL J. FARNSWORTH, JR.*
BRANN W. M. FOWLER

* ALSO ADMITTED TO PRACTICE IN VIRGINIA

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TELEPHONE: 864.250.9119
FACSIMILE: 864.250.9120

April 11, 2016

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

Re: The State v. Maria Movao
Appellate Case Number: 2014-002317
Motion for Extension of Time Within Which to Serve and File the Final Brief

To The Honorable Jenny A. Kitchings,

Please find enclosed the original and six (6) copies of our Motion for Extension of Time Within Which to Serve and File the Final Brief.

I appreciate your consideration of this request, and ask that the filing deadlines be held in abeyance while this request is pending.

Thank you.

With kind regards, I remain,

Sincerely,



Brad Tollison
Paralegal to Daniel J. Farnsworth

Enclosures

cc: The Honorable Alan McCrory Wilson
Senior Assistant Attorney General David A. Spencer

FARNSWORTH LAW OFFICES, LLC

ATTORNEYS AND COUNSELORS AT LAW

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