

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of General Sessions

Kristi Lea Harrington, Circuit Court Chief Administrative Judge

Case No.: 2015-GS-0801333
Appellate Case No.: 2015-002668

RECEIVED

MAY 12 2016

SC Court of Appeals

The State,

Respondent,

v.

Sha'Quille Washington,

Appellant.

**SECOND MOTION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

COMES NOW, Jack B. Swerling, attorney for the Appellant, requesting an extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal. Counsel previously requested an extension of thirty days, and was granted an extension until April 18, 2016. Counsel then requested an additional thirty days, and was granted an extension until May 18, 2016.

Counsel would respectfully request an additional sixty day extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal due to

the following:

1. Counsel has been preparing for a trial in the matter of State v. Hooker that was to begin on April 4, 2016 in Newberry County, however it was continued, and is now scheduled to commence on May 16, 2016.

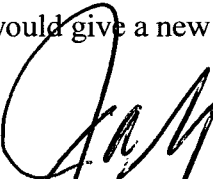
2. Counsel was in a murder trial in the matter of State v. Swinton in Jasper County, which began on April 11, 2016 and lasted four days.

3. Counsel was also preparing for trial on two federal wire tap drug conspiracy cases, which eventually ended in pleas.

4. Counsel is scheduled for a prepaid two week vacation out the country commencing on May 30, 2016.

Counsel's paralegal, Kellie A. Switzer, has consulted with J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General, and he has no objection and consents to the request by counsel.

WHEREFORE, counsel prays the Court will grant an additional sixty day extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal for the foregoing reasons. This would give a new deadline of July 18, 2016.



Jack B. Swerling
1720 Main Street, Suite 301
Columbia, South Carolina 29201
(803) 765-2626

Attorney for Appellant

Columbia, South Carolina
May 12, 2016

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The State,

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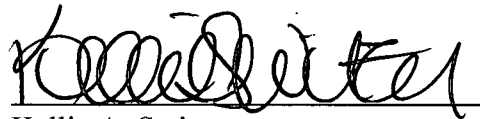
Appellant.

PROOF OF SERVICE

I, Kellie A. Switzer, certify that I have served the **Second Motion for Extension to File the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal** on the following, by depositing a copy of it in the United States Mail, postage prepaid, on May 12, 2016, addressed to:

J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General
Office of the South Carolina Attorney General
Post Office Box 11549
Columbia, South Carolina 29211-1549

May 12, 2016



Kellie A. Switzer
Paralegal to Jack B. Swerling
1720 Main Street, Suite 301
Columbia, South Carolina 29201
Phone (803) 765-2626
Facsimile (803) 799-4059

*Law Offices of
Jack B. Swerling*

*1720 Main Street, Suite 301
Columbia, South Carolina 29201*

*Telephone 803-765-2626
Fax 803-799-4059*

May 12, 2016

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SC Court of Appeals

VIA HAND-DELIVERY

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

RE: The State v. Sha'Quille Washington
Appellate Case No.: 2015-002668

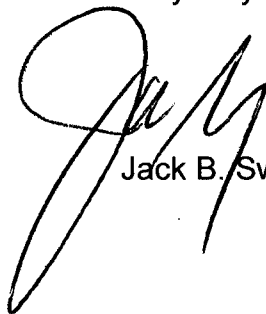
Dear Ms. Kitchings:

Enclosed for filing are the original and six copies of the Second Motion for Extension to File Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal, along with the Proof of Service, in the above referenced matter.

By copy of this letter, I am serving J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General, with a copy of same.

If you have any questions, do not hesitate to contact me.

Very truly yours,



Jack B. Swerling

JBS/kas
Enclosure

cc: J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General
Katherine Carruth Goode, Esquire
Sha'Quille Washington #00365760
Melissa Washington