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3rd RFB due 5/9/16

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of General Sessions

The Honorable Larry B. Hyman, Jr., Circuit Court Judge

RECEIVED
MAY 06 2016
SC Court of Appeals

Appellate Case No.: 2015-002073
Case Nos.: 2013-GS-15-00815;
2013-GS-15-816; and
2013-GS-15-817

THE STATE,

Appellant,

v.

ROXANNE HUGHES,

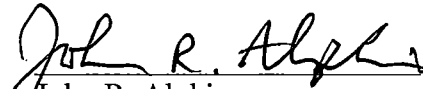
Respondent.

MOTION FOR EXTENSION

Pursuant to the Order of the Supreme Court of South Carolina dated March 18, 2009, Respondent respectfully seeks a thirty (30) day extension of time to file her Initial Brief and Designation of Matter to be Included in the Record on Appeal. This extension is not for the purpose of delay. Respondent has good cause for the extension as the undersigned has been out of work due to an illness. In addition, the issues presented in this appeal are of the utmost importance to the resolution of many other criminal tax cases with the exact same facts and legal issues that are present in this case, which has required extensive research on this complex topic. Counsel for Respondent has consulted with Counsel for the Appellant and Counsel for the Appellant consents to the extension of time. The undersigned has completed a significant portion of the Brief and will complete the same within the next thirty (30) days.

WHEREFORE, based on good cause shown, Respondent prays that the Court extend the deadline for the service and filing of the Initial Brief of the Respondent and her Designation of Matter in this case for thirty (30) days.

Respectfully submitted this 6th day of May, 2016,


John R. Alphin



Alexandra Benevento Mixon
STROM LAW FIRM, LLC
2110 N. Beltline Blvd.
Columbia, South Carolina 29204
Attorneys for Respondent

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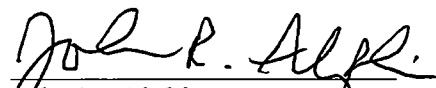
Respondent.

CERTIFICATE OF SERVICE

I, John R. Alphin, attorney for Respondent, Roxanne Hughes do hereby certify that I have served a copy of the foregoing Motion for Extension, in connection with the above referenced case by mailing a copy of the same by United States Mail, postage prepaid, to the following address:

Mark R. Farthing
Post Office Box 11549
Columbia, SC 29211

May 6, 2016


John R. Alphin
STROM LAW FIRM, LLC
2110 N. Beltline Blvd.
Columbia, South Carolina 29204
Attorney for Respondent