

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

On Writ of Certiorari to the Court of Appeals
Appeal From Charleston County
The Honorable J.C. Nicholson, Jr., Circuit Court Judge
Appellate Case No. 2015-001278

RECEIVED

JUN - 6 2016

SC SUPREME COURT

The State,

Petitioner/Respondent,

v.

Raheem D. King,

Respondent/Petitioner.

**MOTION FOR 10-DAY EXTENSION TO FILE
PETITIONER/RESPONDENT'S REPLY BRIEF**

Petitioner/Respondent, State of South Carolina, hereby moves for a 10-day extension of time to file Petitioner/Respondent's Reply Brief in the above appeal. In support of this motion, Petitioner/Respondent submits the following:

1. The Petitioner/Respondent's Reply Brief is due to be served and filed June 6, 2016. The undersigned is unable to complete the Brief by this date and requests a 10-day extension within which to complete the Reply Brief.

2. Petitioner/Respondent's request for a 10-day extension to serve and file the Reply Brief is not made for the purpose of delay, but is due to counsel's unavoidable significant absences from the office due to a work related injury. Counsel continues to be on a medically required work restriction, and is only able to work a few hours per day when possible. Counsel

assures the Court she will make every effort to complete, serve, and file the Reply Brief in this case as soon as possible.

3. The undersigned consulted with counsel for the Respondent/Petitioner, and he consents to the requested relief.

Based on the foregoing, Petitioner/Respondent respectfully requests that this Court grant a 10-day extension in which to file the Reply Brief, and that all deadlines be held in abeyance pending resolution of this Motion.

Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPR
Senior Assistant Deputy Attorney General

By: *Jennifer Ellis Rolun for*
Deborah R.J. Shupe

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BY: *J. Benjamin Aplin*
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ATTORNEYS FOR PETITIONER/RESPONDENT

June 6, 2016

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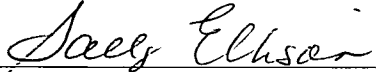
PROOF OF SERVICE

I, Sally B. Ellison, hereby certify I served the Petitioner/Respondent's Motion for a Ten-Day Extension to file a Reply Brief, by placing a copy of same in the United States Mail, postage prepaid, addressed as follows:

Robert M. Dudek
Chief Appellate Defender
SC Commission of Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589

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

This 6th day of June, 2016.


Sally Ellison
Legal Assistant
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