

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of General Sessions

Roger M. Young, Circuit Court Judge

Case Nos. 2014-GS-10-00763
2014-GS-10-00765 and 2014-GS-10-00767

Appellate Case No. 2015-000709

RECEIVED

JUN 10 2016

SC Court of Appeals

The State, Respondent,

v.

Denzel Heyward Appellant

Motion to Extend Time for Filing Reply Brief

Donald Michael Mathison,
Bar # 101803
215 S. Holly Street
Columbia, SC 29205
T: (843) 384-3761
Email: dmichaelmathison@yahoo.com

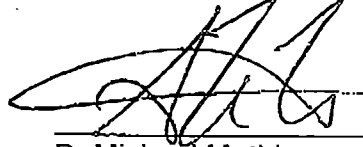
Columbia, South Carolina.

June 10, 2016.

The State, as Respondent, filed and served the Initial Brief of Respondent on May 31, 2016. In accordance with Rule 208(a), the time for filing Appellant's Initial Reply Brief would expire on June 10, 2016. Due to unanticipated, conflicting obligations, Appellant's appointed counsel, D. Michael Mathison, moves for the following relief pursuant to Rule 240, SCACR: An Order Extending the time for Filing the Reply Brief through June 20, 2016.

I have consulted with counsel for Respondent, J. Clayton Mitchell, III, and he has consented to this motion (See Attachment A).

Respectfully Submitted,



D. Michael Mathison
S.C. Bar No. 101803
215 S. Holly Street
Columbia, SC 29205
T: (843) 384-3761
dmichaelmathison@yahoo.com
Attorney for the Appellant

June 10, 2016.

Columbia, South Carolina.

MICHAEL MATHISON

From: Clay Mitchell <CMitchell@scag.gov>
Sent: Friday, June 10, 2016 8:39 AM
To: MICHAEL MATHISON
Cc: rdudek@sccid.sc.gov
Subject: RE: State v. Denzel Heyward (2015-000709) - 10 Day Extension for Reply Brief

No problem. I consent. Thanks.

Clay

-----Original Message-----

From: MICHAEL MATHISON [<mailto:MATHISONM@rcgov.us>]
Sent: Friday, June 10, 2016 6:45 AM
To: Clay Mitchell
Cc: rdudek@sccid.sc.gov
Subject: State v. Denzel Heyward (2015-000709) - 10 Day Extension for Reply Brief

Mr. Mitchell,

Good Morning. I have been a bit under the gun with respect to other obligations, and would like to request a ten day extension to file the Reply Brief in the case referenced. By my calculation the brief would otherwise be due today, June 10, 2016.

Please let me know if you will consent to this motion.

Thank you.

D. Michael Mathison
Reentry Attorney
Richland County Public Defender's Office
1701 Main Street
Columbia, SC 29201
T: (803) 765-2592
M: (843) 384-3761
F: (803) 748-5018

Attachment A.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of General Sessions

Roger M. Young, Circuit Court Judge

Case Nos. 2014-GS-10-00763
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SC Court of Appeals

The State, Respondent,

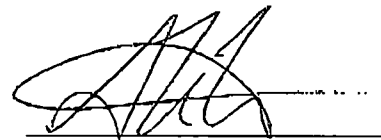
v.

Denzel Heyward Appellant

PROOF OF SERVICE

I certify that, on June 10, 2016, I served the Motion for Extend Time for Filing Reply Brief on the attorneys for the Respondent, by depositing a copy of same with sufficient first-class postage prepaid at the United States Post Office located at Columbia, South Carolina, addressed as follows:

J. Clayton Mitchell, III, Esquire
Alan M. Wilson, Esquire
Office of the Attorney General
P.O. Box 11549
Columbia, S.C. 29211



D. Michael Mathison
Attorney for the Appellant

Donald Michael Mathison**Attorney at Law**

215 S. Holly Street
Columbia, SC 29205

Telephone: (843) 384-3761

Email: dmichaelmathison@yahoo.com

June 10, 2016

VIA FACSIMILE and U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina
Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

JUN 10 2016

SC Court of Appeals

Re: The State of South Carolina v. Denzel Marquise Heyward
Appellate Case No. 2015-000709

Dear Ms. Kitchings,

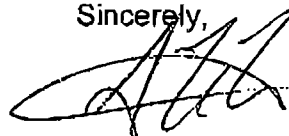
Enclosed please find the original and six copies of the Appellant's Motion For Extension of Time to File Reply Brief in the matter referenced. Also enclosed is the original Proof of Service.

Pursuant to Rule 240(d), this motion does not require a filing fee, because it relates to a criminal matter.

Please let me know if anything further is needed.

With kind regards, I am

Sincerely,



D. Michael Mathison

Cc: J. Clayton Mitchell, III, Esq.
Alan M. Wilson, Esq.
Robert M. Dudek, Esq.

**RICHLAND COUNTY PUBLIC DEFENDER
RICHLAND COUNTY JUDICIAL CENTER**

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REENTRY PROGRAM

RECEIVED

JUN 10 2016

FAX TRANSMITTAL SHEET SC Court of Appeals

TO: The S.C. Court of Appeals, Clerk (803) 734-1839
J. Clayton Mitchell, III, Esq. (803) 734-4113

FROM: D. Michael Mathison, Richland County Public Defender's Office

DATE: 6/10/2016

RE: The State v. Denzel Heyward; Case No. 2015-000709

Total Pages Including Cover: 6

Notes: Please see the following documents

- 1) Letter to the Honorable Jenny Abbott Kitching,
dated June 10, 2016
- 2) Appellant's Motion to Extend Time For Filing
Reply Brief; and
- 3) Proof of Service.

Thank You.

A. L. L.

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