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JUN 20 2016

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of General Sessions

Daniel Dewitt Hall, Circuit Court Judge

Appellate Case No. 2015-001409

State of South Carolina,

Appellant,

v.

Charles Todd Burns,

Respondent.

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Respondent, by his counsel herein, moves this Court for an order granting him an extension of time in which to file the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the matter above, on the grounds stated below:

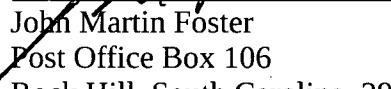
1. Present Counsel for the Respondent, John Martin Foster, has been substituted as counsel of record for the Respondent. By Order of this Court, the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal are due as of this date.
2. Counsel for Respondent has been prevented from filing the Respondent's Initial Brief and Designation of Matter owing to the press of business in his office. This is his second request for extension after his substitution.

The basis of this Motion is the within-cited Rules, the records of this

appeal, which items are hereby incorporated in this Motion.

WHEREFORE, the Respondent herein moves this Court for an extension of time for a period of thirty (30) days in which to file the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal, or until such reasonable time after this Court's ruling upon the Petition for Substitution of Counsel..

June 16, 2016

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, South Carolina 29731  
(803) 324-8100  
Attorneys for Respondent

Other Counsel of Record:

William M. Blich, Jr.  
Assistant Attorney General  
Office of the Attorney General  
Post Office Box 11549  
Columbia, S. C. 29211  
Attorney for Appellant  
(803) 734-3970

THE STATE OF SOUTH CAROLINA  
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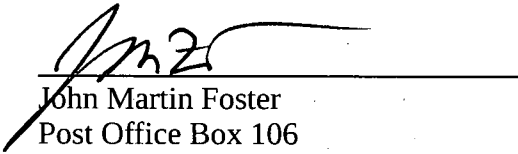
CERTIFICATE OF SERVICE

I certify that I have served the Respondent's Motion for Extension of Time dated June 16, 2016, on the following counsel or persons of record:

William M. Blich, Jr.  
Assistant Attorney General  
Office of the Attorney General  
Post Office Box 11549  
Columbia, S. C. 29211

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out above, pursuant to Rule 262(b), S.C.A.C.R.

June 16, 2016

  
John Martin Foster  
Post Office Box 106  
Rock Hill, S. C. 29731-6106  
803 324-8100  
Attorney for Respondent

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SC Court of Appeals

JOHN MARTIN FOSTER

*Attorney at law*

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|--------------------------------|--------------|------------------------|
| The Guardian Building          | PO Box 106   | 803 324 8100           |
| 223 East Main Street Suite 520 | Rock Hill SC | 803 324 8109 Fax       |
| Rock Hill South Carolina 29730 | 29731-6106   | jmfoster@comporium.net |

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June 16, 2016

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

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SC Court of Appeals

Re: State of SC, Appellant,  
v. Charles Todd Burns, Respondent  
Appeallate Case No. 2015-001409

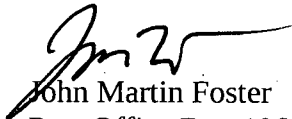
Dear Ms. Kitchings:

In accordance with Rules 240 and 263(a), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Respondent's Motion for Extension of Time, together with Certificate of Service for the same in the above referenced case.

By copy of this letter, I am serving the attorney for the Respondent with copies of the said Motion, as evidenced by the Certificate of Service.

Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

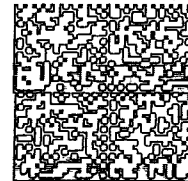
Sincerely,




John Martin Foster  
Post Office Box 106  
Rock Hill, South Carolina 29731  
803 324-8100  
Attorney for Respondent

jmf/  
enclosures

cc: William M. Blicht, Jr.  
Assistant Attorney General  
Office of the Attorney General  
Post Office Box 11549  
Columbia, S. C. 29211  
Attorney for Appellant  
(803) 734-3970



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**John Martin Foster Attorney**

223 East Main St Suite 520  
Post Office Box 106  
Rock Hill SC 29731-6106

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**TO:**

THE HONORABLE JENNY ABBOTT KITCHINGS  
CLERK OF THE COURT OF APPEALS  
POST OFFICE BOX 11629  
COLUMBIA, S.C. 29211

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