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JUN 29 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of General Sessions

Deandrea G. Benjamin, Circuit Court Judge

Appellant Case No. 2014-002126

The State,

Respondent,

v.

Arthur William Macon,

Appellant

MOTION TO EXTEND TIME TO FILE INITIAL REPLY BRIEF

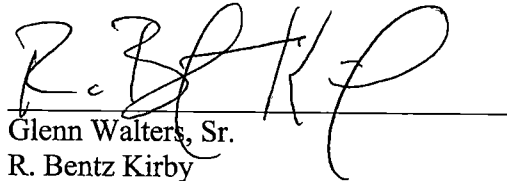
The Appellant hereby files a Motion to Extend Time to File Initial Reply Brief from June 27, 2016 until June 30, 2016. The undersigned has obtained the approval of the Respondent and attaches his email confirming consent to this Motion. In support of the Motion the Appellant hereby states as follows:

1. The deadline for the filing of the Initial Reply Brief is June 27, 2016. That original due date was June 6, 2016 and two (2) ten day extensions were granted.
2. The undersigned is in the process of preparing the Reply Brief and intended to file it on June 27, 2016. Unfortunately, when the undersigned requested the extension to June 27, 2016, he failed to take into account that he had a vacation scheduled to visit his daughter, son-in-law and grandchildren in Virginia Beach, VA. He is scheduled to return home on June 28, 2016 and is informed and believes that an additional extension of two (2) days is necessary to allow the Appellant to fully complete the brief in response to the Respondent's Brief.
3. The undersigned is informed and believes that the Initial Reply Brief will be completed and filed by June 30, 2016.
4. The undersigned attorneys hereby respectfully requests the Court to grant them an extension of time for at least two days to complete their review of the file and record and prepare the Reply Brief.

5. Counsel respectfully requests the time to file the Reply Brief be extended until June 30, 2016, to file and serve the Reply Brief.

6. The undersigned has conferred with counsel for the Respondent who agreed to the Extension of Time and authorized the undersigned to represent this consent to the Court by attaching a copy of her email to this Motion.

This the 26th day June, 2016, at Virginia Beach, VA.

A handwritten signature in black ink, appearing to read "R. Bentz Kirby", written over a horizontal line.

Glenn Walters, Sr.

R. Bentz Kirby

P O Box 1346

Orangeburg, SC 29116

(803) 531-8844

(Fax) (803) 531-3628

Attorneys for Appellant



R Bentz Kirby <rbk.glennwalterspa@gmail.com>

State v Macon

2 messages

R Bentz Kirby <rbk.glennwalterspa@gmail.com>

Fri, Jun 24, 2016 at 9:56 AM

To: Ranee Saunders <rsaunders@scag.gov>

Cc: g Walters <glennwalterspa@gmail.com>

Ranee:

I should have requested an extension up to and through June 30, 2016. It slipped my mind that I was scheduled to travel to Virginia to spend today until next Tuesday with my daughter and her family. My wife and I are going to babysit my four grandchildren so my Daughter can take her husband for a getaway for his birthday.

While I have my research completed and am in the process of formulating the Reply Brief, it struck me this morning as I was packing that it might be difficult for me to complete the brief while babysitting four grandchildren from the ages of 1 to 7.

Therefore, I would like for you to please consent to an extension of time to file the Reply Brief up to and through June 30, 2016. If you can agree, please confirm it by replying to this email with permission for me to attach a copy to my Motion to indicate your consent.

I apologize for not planning better! Thanks,

Bentz

803-413-5676

--

R. Bentz Kirby, Sr.

Phone 803-531-8844

Fax 803-531-3628

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Ranee Saunders <RSaunders@scag.gov>
To: R Bentz Kirby <rbk.glennwalterspa@gmail.com>

Fri, Jun 24, 2016 at 10:12 AM

Not a problem. I am happy to consent to your extension. As the mother of just one toddler, all I can say is I wish you the best of luck handling four little ones at once!

Have a nice weekend,

Ranee

Ranee Saunders

Assistant Attorney General

Criminal Appeals Division

South Carolina Attorney General's Office

Phone (803) 734-2508

Fax (803) 734-4113

From: R Bentz Kirby [mailto:rbk.glennwalterspa@gmail.com]

Sent: Friday, June 24, 2016 9:56 AM

To: Ranee Saunders

Cc: g Walters

Subject: State v Macon

[Quoted text hidden]

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In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
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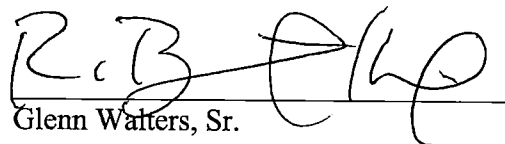
Arthur William Macon,

Appellant

CERTIFICATE OF SERVICE

On the 26th day of June, 2016, the undersigned served a copy of the Motion to Extend Time to File Initial Reply Brief on counsel for the Respondent by placing a copy in the United States Mail, postage fully paid, to the following address:

Ranee Saunders
S.C. Attorney General's Office
PO Box 11549
Columbia, SC 29211



Glenn Walters, Sr.
R. Bentz Kirby
P O Box 1346
Orangeburg, SC 29116
(803) 531-8844
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Attorneys for Appellant

**GLENN WALTERS
ATTORNEY AT LAW, P. A.**

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TELEPHONE: (803) 531-8844 • FACSIMILE: (803) 531-3628

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SC Court of Appeals

Glenn Walters, Sr.
R. Bentz Kirby, Retired and Of Counsel

June 26, 2016

The Hon. Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: The State v Arthur William Macon, Appellate Case No. 2014-2126

Dear Ms Kitchings:

Enclosed you will please find the Motion to Extend Time to File Initial Reply Brief for a time period of two (2) days. We also enclose the \$25.00 filing fee. Please call me at 803-413-5676 with any questions. I have spoken with Ms Saunder's office and she confirmed her consent to the motion via email. She authorized the undersigned to represent this fact to the Court by attaching a copy of the email to the Motion.

With kind regards, I am

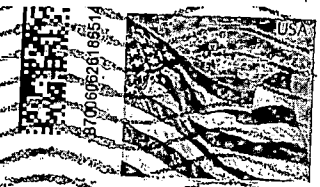
Yours very truly,


R. Bentz Kirby

cc: Ranee Saunders

Arthur Macon
Lieber Correctional Institution
Stono B 20
PO Box 205
Ridgeville, SC 29472

RICHMOND VA 232
MON 27 JUN 2016 PM



R Bentz Kirby
PO Box 1346
Orangeburg, SC 29216

The Hon. Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
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JUN 28 2016

SC Court of Appeals