

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 11 2016

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions
D. Garrsion Hill, Circuit Court Judge

Case No.: 2013-GS-23-003231; 003232; 003233; 003234; 003235; 003236
Appellate Case No.: 2015-000312

The State, Respondent,
vs.
Jerald Denton Gaskins, Jr., Appellant.

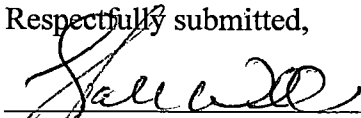
Motion

Appellant hereby moves for an extension of thirty days from the present deadline filing the Record on Appeal and service and filing of the Appellant's Final Brief in this case. Pursuant to the Supreme Court's Order 2009-03-18-01 counsel certifies a belief that the extension is warranted and that there is good cause to seek the extension.

Counsel for Appellant has just completed briefing on the appellant's initial brief in a cross-appeal in another case and is presently briefing the respondent's brief in that appeal. Counsel also has numerous trial matters and client related obligations that have prevented the completion of the record on appeal and final briefs in this case to date. The present deadline for the filing of the Record on Appeal and the service and filing of the Appellant's Final Brief in this case is July 13, 2016. Counsel has scheduled travel out of state July 13 through July 30, 2016. Said travel has been scheduled for over six months and involves a group. Cancelling or altering travel plans would pose a hardship on counsel and members of the group. Due to current caseload and client obligations the record on appeal and final briefs in this case can not be

completed by July 13, 2016. Wherefore it is necessary that counsel request an extension of thirty days from the present deadline in which to file the Record on Appeal and to serve and file the Appellant's Final Briefs in this case.

Respectfully submitted,



J. Falkner Wilkes, 12893
114 Whitsett Street
Greenville, SC 29601
(864) 282-1292
(864) 271-6035 facsimile
jfalknerwilkes@gmail.com

July 8, 2016.

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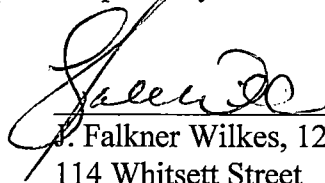
The State, Respondent,
vs.
Jerald Denton Gaskins, Jr., Appellant.

Certificate of Service

I certify that I have, on the 8th day of July, 2016, served the Appellant's Motion for an extension of time for filing the Record on Appeal and service and filing of the Appellant's Final Brief on the Respondent by placing a copy of same in the U. S. Mail, first class postage prepaid, addressed to counsel of record as indicated below:

Mark Reynolds Farthing, Assitant Attorney General
P.O. Box 11549
Columbia, SC 29211

Respectfully submitted,



J. Falkner Wilkes, 12893
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July 8, 2016.

J. FALKNER WILKES

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July 8, 2016

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

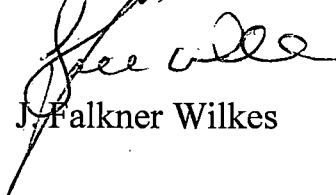
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Re: State v. Jerald Denton Gaskins, Jr., 2013-GS-23-03231

Dear Ms. Kitchings,

I represent the Appellant, Jerald Gaskins. I show the Record on Appeal and Final Brief due next week. I have just completed the Appellant's Initial Brief in the Moore v. Moore case, which is a cross-appeal. I am now working on the Respondent's Initial Brief in that case. I am scheduled for travel out of state July 13th through the 30th, and have been working on client's matter in the order of greatest priority. Due to a heavy caseload and numerous obligations I have not been able to complete the redaction, copying and printing for the record on appeal and final briefs in this case as soon as I had hoped. I have therefore enclosed a motion for an additional thirty days in which to file the record on appeal and to serve and file the final briefs in this case.

Sincerely,



J. Falkner Wilkes

c.
Mark Farthing, Assist. Atty. General
P.O. Box 11549
Columbia, SC 29211

Jerald Denton Gaskins, 00362923
Perry Correctional Institution
430 Oaklawn Road
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J. Falkner Wilkes
Attorney at Law
114 Whitsett Street
Greenville, SC 29601

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