

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM CHARLESTON COUNTY  
Court of General Sessions

J. C. Nicholson, Circuit Court Judge

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Appellate Case No. 2015-001576

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**RECEIVED**

JUL 15 2016

**S.C. SUPREME COURT**

The State of South Carolina.....Respondent/Petitioner,

v.

Venancio Diaz Perez ..... Petitioner/Respondent.

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PETITIONER/RESPONDENT VENANCIO DIAZ PEREZ'S  
MOTION FOR EXTENSION

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Attorneys for Petitioner/Respondent  
Venancio Diaz Perez

Petitioner/Respondent Venancio Diaz Perez moves, pursuant to Rule 240 SCACR, for a twenty day extension to serve his Principal Brief. The grounds for this motion are that preparation for the upcoming trial of Terry v. Yates, 2:11-cv-02289-CWH (a 42 U.S.C. § 1983 action) has and will interfere with completion of this brief, and that recent case law requires additional research to complete the brief. The current deadline is July 18, 2016, but with a 20 day extension this deadline would be August 8, 2016.

Perez's counsel has conferred with counsel for the State, who consents to this request. Perez's counsel is informed that the State will seek an identical extension for its Principal Brief; Perez consents to the State's extension.

Dated: 12 July 2016



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**Attorneys for Petitioner/Respondent  
Venancio Diaz Perez**

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Appellate Case No. 2015-001576

The State of South Carolina..... Respondent/Petitioner,

v.


Venancio Diaz Perez ..... Petitioner/Respondent.

CERTIFICATE OF SERVICE

I certify that I deposited the Petitioner/Respondent's Motion for Extension in the United States Mail, postage prepaid, on 12 July 2016, addressed to the following (in bold):

**Amie L. Clifford**  
**S.C. Atty. General**  
**P.O. Box 11549**  
**Columbia, SC 29211**  
**Attorney for Respondent**  
*Also via email: [aclifford@cpc.sc.gov](mailto:aclifford@cpc.sc.gov)*

**Daniel Shearouse**  
**Clerk of Court**  
**P.O. Box 11330**  
**Columbia, SC 29211**  
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Dated: 7/12/16

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July 12, 2016

Daniel E. Shearouse  
Clerk of Court  
Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

RE: State of South Carolina v. Venancio Diaz Perez  
Appellate Case No.: 2015-001576  
File No.: 79-915

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**S.C. SUPREME COURT**

Dear Mr. Shearouse:


Enclosed please find the original and six copies of Petitioner/Respondent Venancio Diaz Perez's Motion for Extension to serve his Principal Brief regarding the above referenced matter.

Should you have any questions or require further information, please do not hesitate to contact me.

With kind personal regards I remain

Sincerely yours,

**SEIBELS LAW FIRM, P.A.**

  
Erin Magera  
Paralegal

/elm  
Enclosure

cc: Amie L. Clifford (via US Mail and Email) (w/ encl)  
Robert M. Dudek (via US Mail and Email) (w/ encl)