

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions
The Hon. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2015-001983
Lower Court Case No. 2012-GS-42-03135

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MAY 26 2016

The State Respondent,
v.
Charles Allen Cain Petitioner.

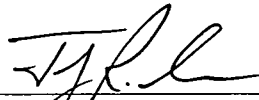
S.C. SUPREME COURT

**REQUEST FOR EXTENSION OF TIME TO FILE AND SERVE
BRIEF AND APPENDIX**

COME NOW the Petitioner, Charles Allen Cain, by and through his counsel of record, and hereby requests a twenty (20) day extension of time to serve and file Petitioner's Brief and Appendix, respectfully showing as follows:

1. This Court Granted Petitioner's Petition for Writ of Certiorari on May, 5, 2016.
2. The present due date for Petitioner's Brief and Appendix is June 6, 2016. Petitioner requests a 20-day extension to that deadline in order to complete counsel's review and to develop their argument. The new deadline will be June 27, 2016.
3. This is Petitioner's first request for an extension.
4. The undersigned counsel has conferred with counsel for Respondent prior to filing this motion. Respondent consents to the requested extension.

Respectfully Submitted,



Thomas J. Rode
Attorney for Appellant
SC Bar No.: 77480

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Attorneys for Petitioner

CERTIFICATE OF SERVICE

The undersigned herewith certifies that she, on this date, did mail and serve via regular U.S. Mail one (1) copy of the foregoing "Notice Of Appearance As Co-Counsel Of Record", with proper postage affixed thereto, to all counsel of record, at the following address:

FOR THE RESPONDENT:

Allen Wilson, Esquire
Salley W. Elliott, Esquire
David Spencer, Esquire
OFFICE OF THE ATTORNEY GENERAL
Post Office Box 11549
Columbia, SC 29211
Phone: (803) 734.3970

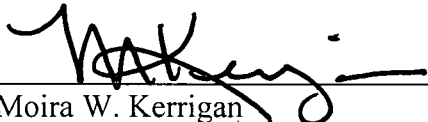
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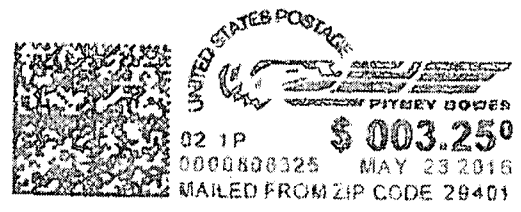
S.C. SUPREME COURT

This 23 day of May, 2016

Thurmond Kirchner & Timbes, P.A.

BY: 
Moira W. Kerrigan
Paralegal to Thomas J. Rode

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THURMOND KIRCHNER & TIMBES, P.A.
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The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
1231 Gervais Street
Columbia, South Carolina 29201

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