

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Spartanburg County
Honorable J. Derham Cole, Circuit Court Judge
Appellate Case No. 2015-002221

RECEIVED

SEP 08 2016

S.C. SUPREME COURT

THE STATE,

Respondent,

v.

ALPHONSO CHAVES THOMPSON,

Petitioner.

**MOTION FOR EXTENSION WITHIN WHICH TO
SERVE AND FILE PETITIONER'S REPLY BRIEF**

Petitioner Alphonso Chaves Thompson respectfully requests a 10-day extension in which to file and serve his Reply brief in this case. Petitioner previously requested a 20-day extension to file his Initial brief in this case and is mindful of this Court's July 16, 2014 Order regarding additional extension requests.

Although the State served its Response brief on August 31, 2016, the undersigned did not receive a copy until September 7, leaving the undersigned with only 5 days in which to draft and file a Reply brief. This delivery delay was likely due to two factors. First, the undersigned moved offices from Charleston to Columbia in June of 2016. Although Petitioner's Initial Brief included the undersigned's current Columbia address, the undersigned did not explicitly inform counsel for the State of his address change. Therefore, the State's Response was originally delivered to the undersigned's Charleston address. Second, the Labor Day holiday likely led to an additional delivery delay. Therefore, Petitioner respectfully requests a 10-day extension in which to file and

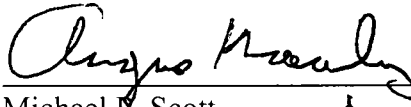
serve his Reply brief and submits that this request falls under the extraordinary circumstances contemplated in this Court's July 16, 2014 Order.

Petitioner's current deadline to file a Reply brief is Monday, September 12, 2016. A 10-day extension would make Petitioner's Reply brief due on or before Thursday, September 22.

The undersigned has consulted with counsel for the State, and the State has graciously consented to this request.

WHEREFORE, Petitioner respectfully prays for a 10-day extension in which to file and serve his Reply brief.

Respectfully submitted,



Michael P. Scott
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*by and with
permission of*

Robert M. Dudek
Chief Appellate Defender
South Carolina Commission on Indigent Defense,
Appellate Division
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September 8, 2016

Attorneys for Appellant

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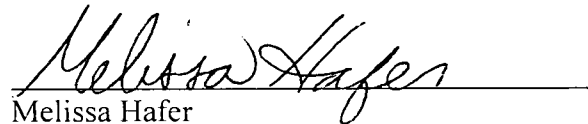
ALPHONSO CHAVES THOMPSON,

Petitioner.

**PROOF OF SERVICE OF MOTION FOR EXTENSION WITHIN
WHICH TO SERVE AND FILE PETITIONER'S REPLY BRIEF**

I, Melissa Hafer, hereby certify that I have served a copy of the MOTION FOR EXTENSION WITHIN WHICH TO SERVE AND FILE PETITIONER'S REPLY BRIEF upon counsel for the other parties by mailing copies to them at the address below via the United States Mail this 8th day of September, 2016.

Mark Farthing, Esquire
Assistant Attorney General
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211


Melissa Hafer

Michael P. Scott
Associate
Admitted in SC

September 8, 2016

VIA HAND DELIVERY

The Honorable Daniel E. Shearouse
Clerk of Court, South Carolina Supreme Court
1231 Gervais Street
Columbia, SC 29201

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S.C. SUPREME COURT

Re: *The State v. Alphonso Chaves Thompson*
Appellate Case No. 2015-002221

Dear Mr. Shearouse:

Enclosed for filing please find an original and seven (7) copies of Petitioner's Motion for Extension Within Which to Serve and File Petitioner's Reply Brief, together with Proof of Service. Please furnish a file-stamped copy of the within motion to our runner.

Charleston

Charlotte

Columbia

Greensboro

Greenville

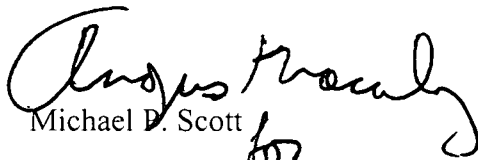
Hilton Head

Myrtle Beach

Raleigh

By copy of this letter, I am serving Mark R. Farthing, of the Attorney General's Office, with a copy of this Motion.

Best regards,


Michael P. Scott
for

MPS/mmh
Enclosures

cc: Mark R. Farthing, Esquire (w/ Enclosure)
The Honorable Jenny Kitchings (w/ Enclosure)