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SEP 30 2016  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
General Sessions Court  
John C. Hayes, III, Judge

Appellate Case No. 2015--001810

State of South Carolina.....Respondent,

vs.

Marquez D. Glenn.....Appellant.

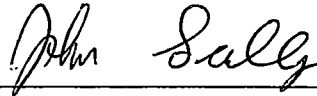
**MOTION FOR EXTENSION OF TIME TO SERVE RECORD ON APPEAL**

Appellant hereby moves the Court for a Thirty (30) day extension of time in which for Appellant to serve the Record on Appeal in the above-referenced matter. This Motion is being made in good faith and for good cause as Counsel for Appellant is awaiting a reply to his earlier correspondence to the Court regarding whether, and in what manner, the Court would like the Appellant's trial court brief to be included in the Record on Appeal. Once the Court responds to the previous correspondence regarding the inclusion of the trial court brief, Counsel for Appellant is confident that the extension hereby requested will be sufficient for completion of the service of the Record on Appeal. This Motion is not interposed for purposes of delay, but is necessary for the appropriate development of the Appeal. In addition to the foregoing, this Motion is also based on the Counsel for Appellant's heavy case load which has recently been increased by Counsel's

acceptance of a Rule 608 criminal defense contract program which has resulted in Counsel for Appellant being appointed in over thirty (30) criminal cases in the past two months.

Respectfully submitted,

BRUMBACK & LANGLEY, LLC



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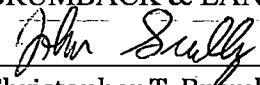
Marquez D. Glenn.....Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to Serve the Record on Appeal on Respondent, State of South Carolina, by email on September 28, 2016, addressed to Interim Senior Assistant Deputy Attorney General Ben Aplin at [baplin@scag.gov](mailto:baplin@scag.gov).

September 28, 2016

BRUMBACK & LANGLEY, LLC



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SC Court of Appeals

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GENERAL & COMPLEX LITIGATION  
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APPELLATE PRACTICE  
CRIMINAL DEFENSE  
PERSONAL INJURY

September 28, 2016

**VIA FACSIMILE & FIRST CLASS MAIL**

Ms. Jenny Abbott Kitchings

P.O. Box 11629

Columbia, SC 29211

Re: *The State v. Marquez Glenn; Appellate Case No.: 2015-001810*

Dear Ms. Kitchings:

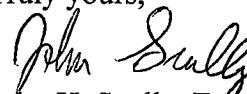
I am writing to you today on behalf of Christopher Brumback, counsel of record for Appellant in the above-referenced matter, to request a thirty (30) day extension to serve the Record on Appeal (hereinafter "the Record") in the above-referenced appeal.

It is my understanding that counsel for Appellant has asked the Court of Appeals in previous correspondence whether, and in what manner, the Record should include the Appellant's brief at the trial court level (hereinafter "the Trial Court Brief"). Counsel for Appellant is diligently working to serve the Record, but we are waiting for guidance from the Court of Appeals regarding the issue of whether and how to include the Trial Court Brief before we submit our Record.

Accordingly, counsel for Appellant respectfully requests a thirty (30) day extension to file the Record in order to allow the Court of Appeals to express its wishes regarding the inclusion of the Trial Court Brief in the Record. A motion to this effect is included with this correspondence.

Please let us know how the Court of Appeals would like the parties to proceed. If you have any questions or require anything else from my office, please do not hesitate to contact Christopher Brumback at (864) 414-9097. With kindest regards, I am

Truly yours,



John H. Scully, Esq.

Brumback & Langley, LLC

JHS/ctb

CC: Ben Aplin (via email)

J