

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
DEC 13 2016
SC Court of Appeals

APPEAL FROM Horry COUNTY
Court of General Sessions

J. Cordell Maddox, Jr., Circuit Court Judge

Case No. 2013-GS-26-05243
Appellate Case No. 2016-001385

State of South Carolina, Respondent,

v.

Heather Elizabeth Sims, Appellant.

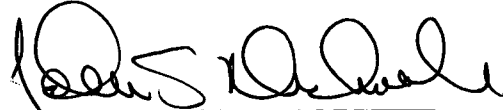
MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, the appellant requests a 30-day extension of the deadline for filing her initial brief and designation of matter to be included in the record on appeal. The current deadline is December 19, 2016. This is the second request for an extension of this deadline and it will be the final extension request.

Because this is a criminal direct appeal, this request is governed by the Court's order *RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings*, S.C. Sup. Ct. Order dated March 18, 2009. The following facts are offered as good cause for the extension: The trial transcript alone is more than 1,900 pages, the pre-trial hearing transcript was also of substantial length, and though counsel has begun drafting the brief, counsel will not be able to complete a draft and present the draft to the client for her review before the current deadline.

By his signature below, counsel for the appellant certifies that he believes the extension is warranted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Blake A. Hewitt", written over a horizontal line.

December 13, 2016

Blake A. Hewitt # 73674

John S. Nichols # 4210

~~BLUESTEIN NICHOLS~~

THOMPSON & DELGADO

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Attorneys for Appellant

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel with a copy of the *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

J. Benjamin Aplin
S.C. Attorney General's Office
PO Box 11549
Columbia, SC 29211

Nancy R. Livesay
Fifteenth Circuit Solicitor's Office
PO Box 1276
Conway, SC 29526



Erin Bridges

December 13, 2016



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

December 13, 2016

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VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: State v. Heather Sims
Case Tracking No.: 2016-001385

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in this matter. I have also enclosed a proof of service of this document on counsel for the Respondent. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to Blake A. Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: L. Morgan Martin, Esquire (by e-mail only)
B. Alexander Hyman, Esquire (by e-mail only)
Nancy R. Livesay, Esquire
J. Benjamin Aplin, Esquire