

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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DEC 19 2016

APPEAL FROM BERKELEY COUNTY
Court of General Sessions

SC Court of Appeals

Kristi Lea Harrington, Circuit Court Chief Administrative Judge

Case No.: 2015-GS-0801333
Appellate Case No.: 2015-002668

The State,

Respondent,

v.

Sha'Quille Washington,

Appellant.

**MOTION FOR EXTENSION TO FILE
INITIAL REPLY BRIEF OF APPELLANT**

COMES NOW, Jack B. Swerling and Katherine Carruth Goode, attorneys for the Appellant, requesting an extension to file the Initial Reply Brief of Appellant. Counsel previously requested an extension of twenty days, and was granted an extension until December 19, 2016.

Counsel would respectfully request an additional twenty-one days extension to file the Initial Reply Brief of Appellant due to the following:

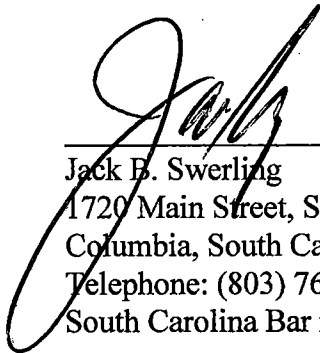
1. Counsel, Katherine Carruth Goode, had a recent death in her family.
2. Counsel, Katherine Carruth Goode and Jack B. Swerling, both have travel

plans scheduled for the end of December 2016, and are to return after the beginning of the year.

The State has raised a number of issues in their Initial Brief that will take additional time to address thoroughly.

Counsel's paralegal, Kellie A. Switzer, has consulted with David A. Spencer, Senior Assistant Attorney General, and he has no objection and consents to the request by counsel.

WHEREFORE, counsel prays the Court will grant an additional twenty-one days extension to file the Initial Reply Brief of Appellant for the foregoing reasons. This would give a new deadline of January 9, 2017.



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South Carolina Bar number 5457

Katherine Carruth Goode
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Attorneys for Appellant

Columbia, South Carolina
December 15, 2016

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Appellant.

PROOF OF SERVICE

I, Kellie A. Switzer, certify that I have served the **Motion for Extension to File the Initial Reply Brief of Appellant** on the following, by depositing a copy of it in the United States Mail, postage prepaid, on December 15, 2016, addressed to:

David Spencer, Senior Assistant Attorney General
Office of the South Carolina Attorney General
Post Office Box 11549
Columbia, South Carolina 29211-1549

December 15, 2016



Kellie A. Switzer
Paralegal to Jack B. Swerling
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December 15, 2016

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

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SC Court of Appeals

RE: The State v. Sha'Quille Washington
Appellate Case No.: 2015-002668

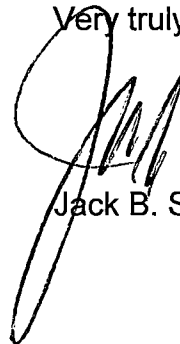
Dear Ms. Kitchings:

Enclosed for filing are the original and six copies of the Motion for Extension to File Initial Reply Brief of Appellant, along with the Proof of Service, in the above referenced matter.

By copy of this letter, I am serving David Spencer, Senior Assistant Attorney General, with a copy of same.

If you have any questions, do not hesitate to contact me.

Very truly yours,



Jack B. Swerling

JBS/kas
Enclosure

cc: David Spencer, Senior Assistant Attorney General
Katherine Carruth Goode, Esquire
Sha'Quille Washington #00365760
Melissa Washington

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