

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
General Sessions Court
Kristi L. Harrington, Circuit Court Judge

Case No. 2015-GS-08-01333
Appellate Case No. 2015-002668

The State,

Respondent,

v.

Sha'Quille Washington,

Appellant.

MOTION FOR EXTENSION

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant, Sha'Quille Washington, by counsel, respectfully moves for a one-week extension of the deadline for serving and filing Appellant's initial reply brief and designation of matter, and in support of this motion states as follows:

By order filed December 21, 2016, the Court of Appeals granted a second extension of the deadline for Appellant's initial reply brief, to January 9, 2017. The undersigned attorney, responsible for drafting the initial reply brief, had to miss almost three full weeks of work due to health issues of a family member, culminating in a twelve-day hospitalization and the need to locate and arrange for this family member to be transferred to a long-term care facility. Because

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of this interruption in counsel's work schedule and other work commitments, she was unable to begin work on the initial reply brief until late last week and completed that work during the weekend, when co-counsel was unavailable to review and consult on final revisions to the initial reply brief. Co-counsel is engaged in a post-conviction relief hearing today, January 9, 2017, and will be unavailable to work on the reply brief until after today's deadline has passed. Accordingly, counsel are requesting a very brief extension of the deadline – one week – to January 16, 2017.

This request is made for good cause, because of unavoidable interruptions in counsel's ability to work, and not for the purpose of delay.

Respondent's counsel, Senior Assistant Attorney General David Spencer, has indicated that he consents to this extension request.

The undersigned attorney, a sole practitioner, certifies that she believes the extension is warranted and that there is good cause to seek the extension. Co-counsel is unavailable to sign this certification because he is in a post-conviction hearing in Lancaster, South Carolina.

Wherefore, Appellant respectfully moves this Court for a one-week extension of the deadline for Appellant's initial reply brief and designation of matter, to January 16, 2017.

Respectfully submitted,



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Attorney for Appellant

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PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension, by mailing a copy, postage prepaid, to counsel for respondent, Senior Assistant Attorney General David Spencer, Office of the Attorney General, P.O. Box 11549, Columbia, South Carolina 29202, on January 9, 2017.


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