

(S)

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

MAR 03 2017

**SC Court of Appeals**

Appeal from Pickens County  
Court of General Sessions

Brian M. Gibbons, Circuit Court Judge

Appellate Case No.: 2016-001387

The State, ..... Respondent,

v.

Suzanna Brown Simpson, ..... Appellant.

MOTION

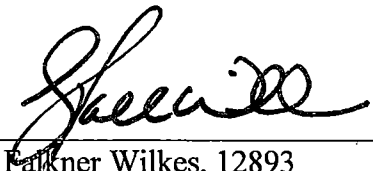
Appellant moves for an extension of time in which to serve and file the Appellant's Initial Brief and Designation of Matter in this case.

Based on the size of the record and the number of issues involved, including the nature of the case and sentence involved, additional time is required to complete the initial briefing. This request is further necessitated by counsel's current case load of appeals, trials, and client obligations. This request is not intended to delay the progress of the case, and is necessary for the proper presentation of the issues to this Court.

Counsel is a sole practitioner and solely responsible for the research and briefing in this case, while at the same time, meeting all other client obligations.

Wherefore, Appellant moves for an additional thirty days in which to serve and file Appellant's Brief and Designation of Matter.

Respectfully submitted,



J. Falkner Wilkes, 12893  
114 Whitsett Street  
Greenville, SC 29601  
(864) 282-1292  
Counsel for Appellant

February 28, 2017.



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CERTIFICATE OF SERVICE

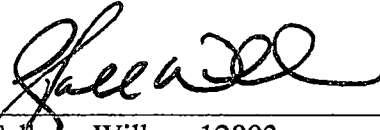
I certify that I have, on the 28<sup>th</sup> day of February, 2017, served a copy of the Appellant's Motion for an extension of time in which to file the Appellant's Initial Brief and Designation of Matter on the Respondent by placing a copy of same in the United States Mail, and by facsimile if so indicated, first class postage prepaid, addressed to counsel of record as follows:

John Benjamin Aplin, Esq.  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211  
Counsel for Respondent

Jenny Abbott Kitchings  
Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201  
via facsimile also to: (803) 734-1839

Suzanna Brown Simpson, 00368727  
Leath Correctional Institution  
2809 Airport Road  
Greenwood, SC 29649

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Wilkes", written in a cursive style.

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J. Falkner Wilkes, 12893  
114 Whitsett Street  
Greenville, SC 29601  
(864) 282-1292  
Counsel for Appellant

February 28, 2017.