

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

MAR 29 2017

**SC Court of Appeals**

Appeal from Laurens County  
Honorable Donald B. Hocker, Circuit Court Judge  
Appellate Case Tracking No. 2015-002206

The State,

Respondent,

vs.

Timothy Artez Pulley,

Appellant.

**MOTION FOR EXTENSION OF TIME  
TO SERVE AND FILE  
INITIAL BRIEF OF RESPONDENT**

Respondent, through its undersigned counsel, would respectfully show unto this Court as follows:

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed March 29, 2017.

II.

Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings: Order of the South Carolina Supreme Court dated March 18, 2009, the Respondent moves for a second extension in the above referenced appeal. Due to the complex, brilliantly crafted issues raised and work required in other cases pending before this Court and the South Carolina Supreme Court, I am unable to complete this brief on time. The undersigned has completed several initial

briefs in the last several weeks. In addition, counsel participated in oral argument at before this Court.

III.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. Further, opposing counsel has indicated his consent to the extension. I would, therefore, request a second extension of time within which to serve and file the Initial Brief of Respondent.

WHEREFORE, Respondent prays that the Court hold this matter in abeyance until ruling on this motion, and extend the deadline for the service and filing of the Initial Brief of Respondent in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON  
Attorney General

WILLIAM M. BLITCH, JR.  
Assistant Attorney General



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ATTORNEYS FOR RESPONDENT

March 29, 2017

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**PROOF OF SERVICE**

I, Anne A. Mueller, certify that I have served the Motion For Extension Of Time Within Which To Serve And File Initial Brief of Respondent on Appellant by depositing a copy of same in the United States mail, postage prepaid, addressed to:

C. Rauch Wise, Esquire  
305 Main Street  
Greenwood, South Carolina 29646

I further certify that all parties required by Rule to be served have been served.

This 29<sup>th</sup> day of March, 2017.



ANNE A. MUELLER  
Office of Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3727



ALAN WILSON  
ATTORNEY GENERAL

March 29, 2017

**VIA HAND DELIVERY**

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

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MAR 29 2017

SC Court of Appeals

Re: State v. Timothy A. Pulley  
Appellate Case Tracking No. 2015-002206

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion For Extension Of Time Within Which To Serve And File Initial Brief of Respondent along with proof of service for filing in the above-referenced appeal.

Sincerely,

William M. Blich, Jr.  
Assistant Attorney General

Enclosures

cc: C. Rauch Wise, Esquire  
Victim Services