

STATE OF SOUTH CAROLINA
IN THE 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.

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APR 27 2017

SC Court of Appeals

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

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

I.

The Initial Brief of Respondent and Designation of Matter are due to be served and filed April 28, 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 third extension in the above referenced appeal. Due to the complex, brilliantly crafted issues raised and work required in other cases, I am unable to complete this brief on time. The undersigned has completed several initial briefs, a Brief of Respondent, and Returns to Petition for Writ of Certiorari in the last several weeks. In addition, counsel participated in oral argument at before this Court.

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The State,

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vs.

APR 27 2017

Timothy Artez Pulley,

Appellant. **SC Court of Appeals**

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 27th day of April, 2017.

Anne Mueller

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

III.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. I am currently working to complete this Brief and hope to have it completed without need for a further extension. I would, therefore, request a third 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



J. BENJAMIN APLIN
Senior Assistant Deputy Attorney General



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ATTORNEYS FOR RESPONDENT

April 27, 2017



ALAN WILSON
ATTORNEY GENERAL

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SC Court of Appeals

April 27, 2017

VIA HAND DELIVERY

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

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