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1st REB due 8/10/17

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP
Attorneys and Counselors at Law
1320 Main Street / 17th Floor / Columbia, SC 29201
Tel: 803.799.2000 Fax: 803.256.7500
www.nelsonmullins.com

Jay T. Thompson
Tel: 803.255.9300
Fax: 803.255.9493
jay.thompson@nelsonmullins.com

August 1, 2017

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: State of South Carolina v. Jeanette Glover
Appellate Case No. 2017-000911
Warrant/Indictment No. 66501HC
Our File No.: 33044/01544

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AUG 01 2017

SC Court of Appeals

Dear Ms. Kitchings:

Respondent State of South Carolina respectfully requests a 30-day extension of time in which to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. This request is in part due to other deadlines and work obligations and in part because, in violation of Rule 207(a), Appellant's counsel failed to obtain or provide a transcript of the underlying municipal court trial and has refused to do so even after we issued a written request for it. Only an audio recording has been provided. Therefore, on behalf of Respondent, we have been placed in a position where we have to obtain a transcript on our own, which is requiring extra time and has created irregularities in the normal procedure and schedule for this case.

Our position is that the time period for Respondent to file an initial brief under Rule 208 should not have begun to run because no transcript has been obtained or provided. However, since Appellant already filed an initial brief and in an abundance of caution, we make this request for an extension. We anticipate seeking recovery of costs under Rules 207 and 222 for any expenses incurred in obtaining a transcript and in making this motion.

This is Respondent's first request for an extension of time. According to our calculations, if the time period for Respondent's Initial Brief and Designation began to run after service of Appellant's initial brief, then they are currently due on Thursday, August 10, 2017, and with the 30-day extension of time, the new deadline would be Monday, September 11, 2017. We



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also ask that the Court hold the current deadline in abeyance until an Order is issued on this request.

Enclosed is a copy of this letter request and a firm check for the filing fee. We ask that you return the copy to us bearing the Court's file stamp via our courier. By copy of this letter to counsel of record, we are serving her with a copy of this filing.

Very truly yours,



Jay T. Thompson

JTT:lwd
Enclosures

cc: Minh L. Wyman