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1st AFB due 9/6/17

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY

Court of General Sessions
Honorable Donald B Hocker, Eighth Circuit Court Judge

Case No.: 2017-001016

The State, Respondent v. Gabriel Betancourt, Appellant

REQUEST FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF

RECEIVED

SEP 07 2017

SC Court of Appeals

Counsel for Respondent:

J. Benjamin Alpin
Assistant Deputy Attorney General
P.O. Box 11549
Columbia, SC 29211

Counsel for Appellant:

William G. Yarborough, III
522 North Church Street
Greenville, SC 29601
SC Bar No.: 10271

Christy Sustakovitch, Assistant Solicitor
Greenville County Solicitor's Office
Greenville County Courthouse
305 E. North Street
Greenville, SC 29601

✓

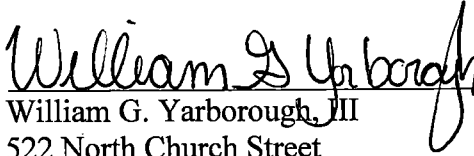
Undersigned counsel, William G. Yarbrough, III, for Appellant, Gabriel Betancourt, respectfully requests a thirty (30) day extension to file the Appellant's Initial Brief and Designation of Matter.

Counsel just received a copy of the video interview of a trial witness this week and is currently preparing for trial in the United States District Court of South Carolina-Greenville Division scheduled for September 12, 2017. The allowance of a thirty (30) day extension of time would ensure that Counsel is able to adequately prepare Appellant's Initial Brief.

Counsel has not previously asked for a continuance in this matter and has spoken with the Respondent, Assistant Deputy Attorney General J. Benjamin Alpin, whom has no objection to Counsel's request for an extension.

A copy of this request has been provided to the Office of the Attorney General.

Respectfully Requested,


William G. Yarbrough, III
522 North Church Street
Greenville, SC 29601
SC Bar# 10271

September 1, 2017

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I, Natasha Perez-Pendergrass, certify on this date, September 1, 2017, I served Motion for Extension of Time to File Reply Brief in this action, dated September 1, 2017 on Ms. Margaret J. "Peggy" Self and Mr. Joshua Underwood by mailing it to him/her at his/her work place address, by depositing it in the U.S. Mail, in an envelope with sufficient postage affixed, addressed as follows:

Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
PO Box 11629
Columbia, SC 29211

Counsel for Respondent:
J. Benjamin Alpin
Assistant Deputy Attorney General
P.O. Box 11549
Columbia, SC 29211

Christy Sustakovitch, Assistant Solicitor
Greenville County Solicitor's Office
Greenville County Courthouse
305 E. North Street
Greenville, SC 29601

Respectfully submitted,

Natasha Perez-Pendergrass

Natasha Perez-Pendergrass

Paralegal to William G. Yarborough III, Esquire

SWORN TO before this 1st

Day of September 2017

Rachael L. Alejandro

Notary Public for South Carolina

My Commission expires: 06-08-2022

