

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of General Sessions

The Honorable Robert E. Hood, Circuit Court Judge

Appellate Case No. 2012-001203
General Sessions Case Nos. 2013-GS-40-06520 & 2013-GS-40-06521

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SEP 15 2017

SC Court of Appeals

The State of South Carolina,..... Respondent,

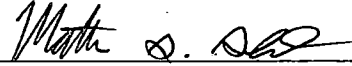
v.

Robert Antonio Guinyard,..... Appellant.

**MOTION FOR EXTENSION OF TIME
TO FILE PETITION FOR WRIT OF CERTIORARI**

Pursuant to Rules 263(b) and 240, SCACR, the undersigned counsel for Appellant respectfully requests a short, 14-day extension of the deadline to file a Petition for Writ of Certiorari until September 29, 2017. This is the first such request and is made in good faith and not for the purpose of delay. The grounds for this request are that the undersigned is appointed pro bono counsel as part of the 2014 Appellate Practice Project and, given the other demands of his practice, the undersigned needs additional time to prepare a Petition for Writ of Certiorari and compile the Appendix. The undersigned further requests that the deadline for filing a Petition for Writ of Certiorari (currently September 15, 2017) be stayed pending a ruling on this motion. Finally, the undersigned

has attempted to consult with Amie L. Clifford, Esquire, counsel for Respondent, but did not receive a response prior to filing this motion.



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Attorneys for Appellant

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Appellate Case No. 2012-001203
General Sessions Case Nos. 2013-GS-40-06520 & 2013-GS-40-06521

The State of South Carolina, Respondent,

v.

Robert Antonio Guinyard, Appellant.

PROOF OF SERVICE

I, the undersigned employee of Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on September 14, 2017, served a copy of the enclosed **MOTION FOR EXTENSION OF TIME TO FILE PETITION FOR WRIT OF CERTIORARI** upon the persons listed below, by depositing copies of the documents in the United States Mail, first class, sufficient postage prepaid, with the return address(es) clearly noted, addressed as follows.

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Post Office Box 11629
Columbia, SC 29211

Amie L. Clifford, Esquire
Special Assistant Attorney General
Post Office Box 11549
Columbia, SC 29211



Kim Robins
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ATTORNEYS AT LAW

OF COUNSEL
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IN TAXATION

RUDOLPH C. BARNES
(1917-1995)
JAMES W. ALFORD
(1930-2008)

September 14, 2017

VIA HAND DELIVERY

The Honorable Daniel E. Shearouse
South Carolina Supreme Court
1231 Gervais Street
Post Office Box 11330
Columbia, SC 29211

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SEP 15 2017
SC Court of Appeals

Re: State v. Guinyard
Appellate Case No. 2012-001203
BASJ File No. 528.20188

Dear Mr. Shearouse:

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension of Time to File Petition for Writ of Certiorari in this matter. Please file the original and six (6) copies of the motion and return one (1) clocked copy with our courier. I understand there is no filing fee because this is a criminal matter.

By copy of this letter, I am serving counsel for Respondent with a copy of the motion. I am also serving a copy upon the Clerk of the Court of Appeals. Thank you for your assistance in this matter.

With kindest regards, I remain

Very truly yours,

Matthew G. Gerrald

MGG/rbd
Enclosures

cc: Amie L. Clifford, Esquire (*via regular mail*)
The Honorable Jenny Abbott Kitchings (*via regular mail*)
Robert M. Dudek, Esquire (*via regular mail*)

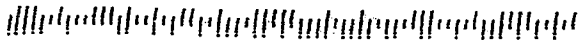
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