

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Appeal from Greenville County
Court of General Sessions
Hon. Edward W. Miller, Circuit Court Judge

NOV 08 2017

SC Court of Appeals

Appellate Court Case No.: 2017-001013

The State, Appellant,
v.
Kathryn Martin Key, Respondent.

MOTION

The Respondent moves the Court to grant an extension in which to file and serve the initial brief and designation of matter in this case. Counsel presently is working on a petition in Lamar Williams v. State; and briefs in Gibbs v. Gibbs in the Supreme Court along with briefs in Dimarco v. Dimarco; Train Auto v. Howell, in this Court. Counsel has additional appeals in various stages of briefing, as well as numerous trial related issues that demand immediate attention to meet discovery demands and prepare for trial. Counsel further has had numerous on-going client related matters that have required extensive time and immediate attention over the past thirty days.

The undersigned certifies that the time devoted to other cases has been necessary to meet client demands and balance the obligations of counsel to perform case related tasks in the most reasonable manner that will benefit all clients without harming any



one client. The undersigned submits that good cause exists for an extension of time in this case.

Wherefore the Respondent moves the Court for an extension of thirty days in which to serve and file the Respondent's Initial Brief and Designation of Matter in this case.

Respectfully submitted,



J. Falkner Wilkes (SC Bar #12893)
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Greenville, SC 29601
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(864) 271-6035 (facsimile)

James H. Price, III
Powers Price
644 East Washington Street
Greenville, SC 29601

Counsel for Respondent

November 6, 2017.

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CERTIFICATE OF SERVICE

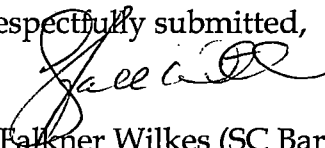
I certify that on November 6, 2017, I served the Motion for an extension of time in which to file and serve the Respondent's Initial Brief and Designation of Matter on the Appellant by placing a copy of same in the United States Mail, first class postage prepaid, addressed to counsel of record and others as indicated below:

William M. Blich, Jr., Assist Atty Gen
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211

Attorney for Appellant
and to:

Jenny Abbott Kitchings
Clerk of the Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Respectfully submitted,


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Counsel for Respondent

November 6, 2017.



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