

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Pickens County
Court of General Sessions

Brian M. Gibbons, Circuit Court Judge

Appellate Case No.: 2016-001387

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SC Court of Appeals

The State, Respondent,

v.

Suzanna Brown Simpson, Appellant.

MOTION

Appellant hereby moves this Court to Relax the Time for serving and filing the Final Briefs and filing the Record on Appeal in the above case, and grant an additional thirty days in which to serve and file the Appellant's Final Brief and to file the Record on Appeal.

Counsel currently has a large number of appellate cases in various stages of briefing. Counsel also has a large number of trial level cases that demand continuous attention. Over the past 60 days counsel has been involved in a complex business litigation that has required an unusual amount of time be devoted to the case. Counsel has diligently worked for over thirty days, weekends included, to meet all professional obligations. Time has been allocated between cases based on priorities in a way that will best promote all client interests without sacrificing the interests of any one for the other. As a result of the need to balance priorities between client matters and allocate time in a professionally responsible manner, the printing of the Final Briefs and Record on Appeal has not been completed and additional time is needed.

Counsel certifies his belief that good cause exists for the relief requested.

Wherefore, the undersigned moves for an additional thirty days in which to serve and file the Appellant's Final Briefs and to file the Record on Appeal.

Respectfully submitted,



L. Falkner Wilkes, 12893
114 Whitsett Street
Greenville, SC 29601
(864) 282-1292
Counsel for Appellant

November 17, 2017.

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CERTIFICATE OF SERVICE

I certify that I have, on the 17th day of November, 2017, served a copy of the Appellant's Motion to relax the time and extend the time in which to file and serve the Appellant's Final Brief and file the Record on Appeal on the Respondent by placing a copy of same in the United States Mail, and by facsimile if so indicated, first class postage prepaid, addressed to counsel of record as follows:

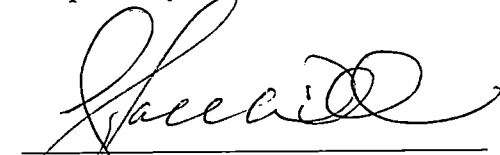
John Benjamin Aplin, Esq.
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211
Counsel for Respondent

and to:

Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

Suzanna Brown Simpson, 00368727
Leath Correctional Institution
2809 Airport Road
Greenwood, SC 29649

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Falkner Wilkes". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke extending to the right.

J. Falkner Wilkes, 12893
114 Whitsett Street
Greenville, SC 29601
(864) 282-1292
Counsel for Appellant

November 17, 2017.

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J. Falkner Wilkes
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Jenny Abbott Kitchings
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