

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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**RECEIVED**

DEC 08 2017

SC Court of Appeals

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Appellate Court Case No.: 2017-001013

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

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MOTION

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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: service of the final briefs and records in State v. Simpson due 120517, a petition for certiorari in the Supreme Court in Lamar Williams v. State due 121317; the return in the Supreme Court in State v. Young due 121117. Counsel is further working on numerous trial level matters, including a complex business case which is scheduled for a hearing 120717. Counsel has over the past thirty days served and filed the Respondent's initial brief in Dimarco v. Dimarco; the final briefs and record in Train Auto v. Howell. 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.

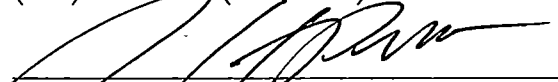
The undersigned certifies that the time devoted to other cases has been necessary to meet client demands and balance the obligations of counsel to perform case related tasks in the most reasonable manner that will benefit all clients without harming any one client. The undersigned submits that good cause 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. Folkner Wilkes (SC Bar #12893)  
114 Whitsett Street  
Greenville, SC 29601  
(864) 282-1292  
(864) 271-6035 (facsimile)

  
James H. Price, III

Powers Price  
644 East Washington Street  
Greenville, SC 29601

*Counsel for Respondent*

December 5, 2017.

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CERTIFICATE OF SERVICE  
\_\_\_\_\_

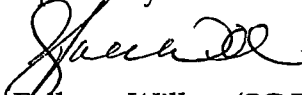
I certify that on December 5, 2017, I served the Motion for an extension of time in which to file and serve the Respondent's Initial Brief and Designation of Matter on the Appellant by placing a copy of same in the United States Mail, first class postage prepaid, addressed to counsel of record and others as indicated below:

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

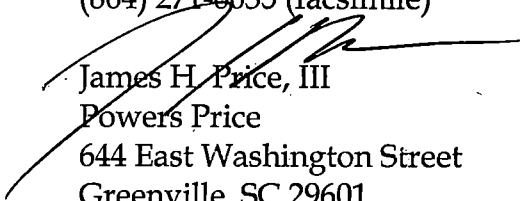
Attorney for Appellant  
and to:

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

Respectfully submitted,



J. Falkner Wilkes (SC Bar #12893)  
114 Whitsett Street  
Greenville, SC 29601  
(864) 282-1292  
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James H. Price, III

Powers Price  
644 East Washington Street  
Greenville, SC 29601

*Counsel for Respondent*

December 5, 2017.

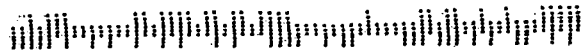
J. Falkner Wilkes  
Attorney at Law  
114 Whitsett Street  
Greenville, SC 29601

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



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