

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from York County

Honorable S. Jackson Kimble, II Circuit Court Judge

NATHAN MORGAN,

RESPONDENT,

V.

CITY OF ROCK HILL,

APPELLANT

APPELLATE CASE NO. 2017-001530

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF RESPONDENT

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SC Court of Appeals

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of Respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of respondent is due to be served and filed December 18, 2017.
2. Counsel for Respondent is a Public Defender in York County. The weeks of November 13th, November 27th and December 11th were weeks of court in York County. Because of his high case load and limited resources, counsel used a great deal of time preparing for court those two weeks. As a result, counsel has been unable to complete the Initial Brief for Respondent in this case.



3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Charles Rudnick
Attorney for Respondent

This 18th day of December, 2017

**Sixteenth Circuit
Public Defender
Office**

Moss Justice Center
1675-1E York Highway
P.O. Box 691
York, S.C. 29745



Harry A. Dest
Sixteenth Circuit Defender

Bryson J. Barrowclough
Deputy Public Defender

Stacey D. Coleman
Juvenile Division

Philip L. Smith
Melissa A. Inzerillo
Sr. Assistant Public Defenders

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Mark T. McKinnon
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Raia Hirsch
Jeff Zuschke
Charles H. Rudnick
Monier M. Abusoft
Sherril Alford
Harris Kaufman
Raia Hirsch

Union County Public Defender
Erik D. Delaney
Jennifer N. Williams

October 3, 2017

The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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Re: Nathan Morgan v. The State, Appellate Case No. 2017-001530

Dear Ms. Kitchings:

The Initial Brief of Respondent in the above case is due to be served and filed with the Court on October 5, 2017. However, due to my heavy work-load, I am requesting a thirty day extension in which to serve and file this brief.

By copy of this letter, I am informing Christopher E. Barton, Esquire, of the Rock Hill Solicitor's office of my request.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Rudnick".

Charles H. Rudnick
16th Circuit Assistant Public Defender

RMD/cnp

cc: Christopher E. Barton, Esq.



16th JUDICIAL CIRCUIT
PUBLIC DEFENDER OFFICE
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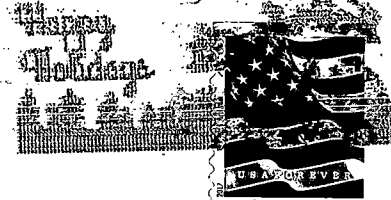
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The Honorable Jenny Abbott Kitchings
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