

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

R. Keith Kelly, Circuit Court Judge

Case No. 2016-GS-42-0169
Appellate Case No: 2016-001651

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DEC 27 2017
SC Court of Appeals

The State, County of Spartanburg,

Respondent,

v.

Danny Vega,

Appellant.

MOTION REQUESTING PERMISSION TO SERVE OUTSIDE OF DEADLINE

COMES NOW the Appellant, Danny Vega would, by and through his attorney, David R. Schumpert III, respectfully move this Honorable Court to enter an order granting permission to serve the *Record on Appeal* outside of the deadline set in Rules 210 of the South Carolina Appellate Court Rules.

The preparation of these documents has been delayed by various factors:

- 1) Appellant's counsel, a small solo practitioner firm, has suffered delays due to workload and limited resources;
- 2) Financial constraints due to the Appellant's financial hardship have caused further delays;

As a result of these various hardships the Appellant and Appellant's counsel humbly request that the Court grant additional time to serve the *Record on Appeal*.

This motion is filed in a timely manner per letter sent by Clerk December 5, 2017 and copied to all parties.

WHEREFORE, Appellant respectfully requests the following relief:

- A) That this Court grant permission to serve the *Record on Appeal* outside the time constraints
- B) Such other relief as the Court finds just and proper.

Respectfully submitted,

SCHUMPERT LITIGATION & MEDIATION

December 15, 2017



David R Schumpert III
Post Office Box 16466
Seneca, South Carolina 29679
(803) 237-8384
Attorney for Appellant

Other Counsel of Record:

Megan L. Moricle, Esquire
Assistant Solicitor, Seventh Judicial Circuit
Spartanburg County Judicial Center
180 Magnolia Street
Spartanburg, SC 29306

Alan McCrory Wilson, Esquire
John Benjamin Aplin, Esquire
South Carolina Attorney General
PO Box 11549
Columbia, SC 29211-1549

SCHUMPERT

Litigation & Mediation

P.O. Box 1646, Seneca, South Carolina 29679

108 Worth Street, Seneca, South Carolina 29672

David Robert Schumpert III Esq.
Attorney and Counselor at Law
(803) 237-8384
schumpertlaw@gmail.com

Shrieka E. Gilliard
Paralegal
(843) 509-1323
segilliard@gmail.com

December 15, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
Via CERTIFIED MAIL

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SC Court of Appeals

RE: State of South Carolina, County of Spartanburg vs. Danny Vega,
Appellate Case Number: 2016-001651
General Session Case: 2016-GS-42-0169

Dear Ms. Kitchings:

Enclosed for filing please find original and copies of the following documents:

- 1) Motion Requesting Permission to Serve Record on Appeal Outside of Deadlines**

Sincerely,



David R Schumpert III
Post Office Box 1646
Seneca, South Carolina 29679
(803) 237-8384
Attorney for Appellant

Enclosure

CC: Megan L. Moricle, Esquire
Assistant Solicitor, Seventh Judicial Circuit
Spartanburg County Judicial Center
180 Magnolia Street
Spartanburg, SC 29306

Alan McCrory Wilson, Esquire
John Benjamin Aplin, Esquire
South Carolina Attorney General
PO Box 11549
Columbia, SC 29211-1549

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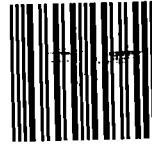
Schumpert Litigation & Mediation
P. O. Box 1646
Seneca, SC 29679



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Columbia, South Carolina 29211

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