

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from York County

Honorable S. Jackson Kimble, II Circuit Court Judge

RECEIVED
JAN 11 2018
SC Court of Appeals

NATHAN MORGAN,

RESPONDENT,

V.

CITY OF ROCK HILL,

APPELLANT

APPELLATE CASE NO. 2017-001530

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF RESPONDENT

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.

✓

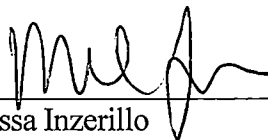
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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



Melissa Inzerillo
Senior Public Defender

This 8th day of January, 2018



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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December 29, 2017

Mr. Charles Harold Rudnick, Esquire
1675-1E York Hwy
PO Box 691
York SC 29745

Re: City of Rock Hill v. Nathan Morgan
Appellate Case No. 2017-001530

Dear Counsel:

Upon reviewing your third motion for an extension of time to serve and file the initial brief of respondent and designation of matter, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

~~Please provide a corrected motion with a signature of your immediate supervisor, as required by the Supreme Court order dated March 18, 2009. (www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2009-03-18-01)~~

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jenny A. Kitchings".

CLERK

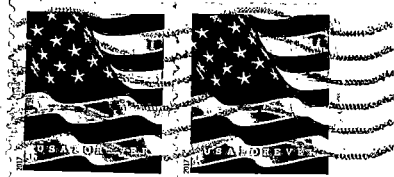
cc: Christopher Edward Barton, Esquire



**16th JUDICIAL CIRCUIT
PUBLIC DEFENDER OFFICE**
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CHARLOTTE NC 282

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The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
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