

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE STATE GRAND JURY
Richland County
Court of General Sessions

Carmen T. Mullen, Circuit Court Judge

Case No. 2017-GS-47-12, -13, -32

RECEIVED
MAY 21 2018
SC Court of Appeals

The State,.....Appellant

v.

Richard M. Quinn, Jr.,.....Respondent

APPELLATE CASE NO. 2018-000494

MOTION FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER - SECOND

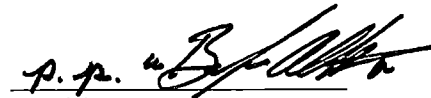
Appellant respectfully requests an additional 30 (thirty) day extension of time to file Appellant's initial brief and designation of matter. The Initial Brief of Appellant and Designation of Matter are due to be filed May 23, 2018. Pursuant to RE: Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings, S.C.Sup.Ct. Order dated March 18, 2009 (Davis Adv.Sh. No. 13), Appellant moves for a second extension in the above captioned appeal. Good cause exists to grant this extension because Counsel for the State has been required to spend considerable time preparing for an upcoming trial arising from this State Grand Jury investigation, as well as preparing other recent business before the State Grand Jury and attending

to the First Judicial Circuit's responsibilities beyond this State Grand Jury matter. As a result, Counsel for the State requires additional time to complete the Brief.

This extension request is not intended for purposes of delay, but rather to ensure the Brief is properly researched and prepared. The Brief is substantially complete, and Counsel for the State does not anticipate any further extensions. I would therefore request a second extension of time to file the Initial Brief of Appellant and Designation of Matter.

WHEREFORE, Appellant prays that the Court hold this matter in abeyance until ruling on this motion and extend the deadline for service and filing of the Initial Brief of Appellant and Designation of Matter in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted by,



David. M. Pascoe, Jr.
SC Bar No.: 66523
First Circuit Solicitor
P.O. Box 1525
Orangeburg, SC 29116
(803) 533-6252
Attorney for Appellant

May 17, 2018
Orangeburg, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE STATE GRAND JURY
Richland County
Court of General Sessions

Carmen T. Mullen, Circuit Court Judge

Case No. 2017-GS-47-12, -13, -32

RECEIVED

MAY 21 2018

SC Court of Appeals

The State.....Appellant

v.

Richard M. Quinn, Jr.....Respondent

APPELLATE CASE NO. 2018-000494

PROOF OF SERVICE

I, W. Baker Allen, certify that I have served the Motion for Extension of Time to File Initial Brief and Designation of Matter – Second on Respondent by depositing a copy of the same in the United States mail, postage prepaid, this 17th day of May, 2018, addressed to:

Matthew Richardson, Esq.
801 Gervais Street, Suite B
Columbia, South Carolina 29201

Johnny Gasser, Esq.
Gregory Harris, Esq.
1526 Laurel St.
Columbia, SC 29201



W. Baker Allen
Assistant Solicitor
First Judicial Circuit
P.O. Box 1525
Orangeburg, SC 29116

The State of South Carolina

OFFICE OF SOLICITOR
First Judicial Circuit

140 North Main Street
Suite 102
Summerville, SC 29483
(843) 871-2640
FAX (843) 871-2643
PTI (843) 873-7842



DAVID M. PASCOE
Solicitor

5200 East Jim Bilton Boulevard
Dorchester County Courthouse
St. George, SC 29477
(843) 832-0150
FAX (843) 832-0155

Courthouse, Amelia Street
Post Office Box 1525
Orangeburg, SC 29116
(803) 533-6252
FAX (803) 533-6004
PTI (803) 533-6137

102 Courthouse Drive
Suite 111
St. Matthews, SC 29135
(803) 874-1978
FAX (803) 874-1242

May 17, 2018

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

RECEIVED
MAY 21 2018
SC Court of Appeals

RE: The State v. Richard M. Quinn, Jr.
Appellate Case No. 2018-000494

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of a Motion for Extension of Time to File Initial Briefs and Designation of Matter – Second along with proof of service for filing in the above referenced appeal.

Sincerely,

W. Baker Allen
Assistant Solicitor
First Judicial Circuit

Enclosures

cc: Matthew Richardson
Gregory Harris
Johnny Gasser