

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of General Sessions

Letitia H. Verdin, Circuit Court Judge

Appellate Case No.: 2017-002042
Case Nos.: 2015GS3901893, 2015GS3901895

RECEIVED

JUL 12 2018

SC Court of Appeals

The State Respondent

v.

Jaron Lamont Gibbs Appellant

**MOTION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

COMES NOW, Jack B. Swerling, attorney for the Appellant, requesting an extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal. Counsel previously requested extensions which were granted and extended until July 18, 2018.

Counsel would respectfully request an additional thirty day extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal due to the following:

1. Counsel's wife has been having medical issues for some period of time, but in the past two weeks, counsel has had to devote a considerable amount of time at home because she is in severe pain. Counsel's wife was admitted to Lexington Medical Center today. Counsel's wife is scheduled for spinal surgery on July 17, 2018.

2. Counsel is in the midst of preparing several cases for trial - USA v. Frederick Augustine, USA v. Abraham Rodriguez, State v. Andrey Kucherin and State v. Kartrez Rush.

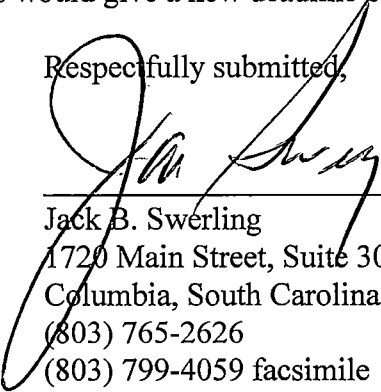
3. Counsel has another brief due in the Court of Appeals on July 20, 2018 in the case of State v. Shawn Bisnauth, which he plans to file.

4. Counsel has numerous other case related issues that he must deal with.

Counsel's paralegal, Kellie Reaves, has consulted with Melody J. Brown, Senior Assistant Deputy Attorney General, and she has no objection and consents to the request by counsel.

WHEREFORE, counsel prays the Court will grant an additional thirty day extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal for the foregoing reasons. This would give a new deadline of August 16, 2018.

Respectfully submitted,



Jack B. Swerling
1720 Main Street, Suite 301
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Attorney for Appellant

Columbia, South Carolina
July 12, 2018

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PROOF OF SERVICE

I, Kellie Reaves, certify that I have served the **Motion for Extension to File the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal** on the following, by depositing a copy of it in the United States Mail, postage prepaid, on July 12, 2018, addressed to:

J. Benjamin Aplin, Senior Assistant Deputy Attorney General
Office of the South Carolina Attorney General
Post Office Box 11549
Columbia, South Carolina 29211-1549



Kellie Reaves
Paralegal to Jack B. Swerling
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July 12, 2018

VIA HAND-DELIVERY

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

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SC Court of Appeals

RE: The State v. Jaron Lamont Gibbs
Appellate Case No.: 2017-002042

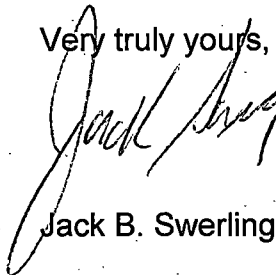
Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of the Motion for Extension to file Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal, along with the Proof of Service, in the above referenced matter.

By copy of this letter, I am serving J. Benjamin Aplin, Senior Assistant Deputy Attorney General, with a copy of same.

If you have any questions, do not hesitate to contact me.

Very truly yours,



Jack B. Swerling

JBS/ksr
Enclosures

cc: J. Benjamin Aplin, Senior Assistant Deputy Attorney General
Katherine Carruth Goode, Esquire (VIA EMAIL)
Jaron Lamont Gibbs #00366858

✓