

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM YORK COUNTY
Court of General Sessions

JUL 23 2018

SC Court of Appeals

The Honorable Brian M. Gibbons, Circuit Court Judge

Appellate Case No.: 2018-00423

The State

Respondent,

v.

Jonathan S. Ostrowski

Appellant.

**MOTION FOR EXTENSION TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

ATTORNEYS FOR APPELLANT

WILLIAM G. YARBOROUGH III, ESQ.

LAUREN C. HOBBS, ESQ.

WILLIAM G. YARBOROUGH III, ATTORNEY AT LAW, LLC
522 North Church Street
Greenville South Carolina 29601
(864) 331-1612

✓

NOW COMES Appellant, Jonathan S. Ostrowski, by and through counsel of record, William G. Yarborough III and Lauren C. Hobbis, and would respectfully move this Honorable Court to extend the time to file and serve Appellant's initial brief and designation of matter by thirty (30) days.

Counsel's office received the trial transcript on June 14, 2018. The initial brief and designation of matter are due to be filed with the Court and served upon the Respondent today, July 16, 2018 pursuant to Rule 208(a) and Rule 263(a), SCACR. This request is made in light of Counsel's heavy caseload and the need to ensure accurate identification and receipt of trial exhibits in order to prepare the brief and designation of matter. In regards to Counsel's current case load, Counsel has been preparing for filings due and upcoming trials and evidentiary hearings in the following cases: United States v. Antonio Crawley, case no. 18-4073 (direct appeal); United States v. Everette Dawkins, case no. 18-4021 (direct appeal), United States v. Harold Brunson, 18-4326 (direct appeal); State v. Dana Morton 2017GS4204141 – 4142 (trial scheduled for July 23-27, 2018); State v. Christel House, 2018GS4201115 (trial scheduled for July 23-27, 2018); Darnell Slaton v. State, 2017CP4601911 (PCR hearing scheduled for July 30, 2018).

Counsel contacted representative for the Respondent, Senior Assistant Attorney General John Benjamin Aplin, for his position on this extension request on Friday, July 13, 2018; but Mr. Aplin is away until July 19, 2018.

Counsel submits that an extension would ensure adequate preparation of Appellant's initial brief and designation of matter. Counsel makes this request in the ends of justice and her ability to perfect the Appellant's appeal as his advocate.

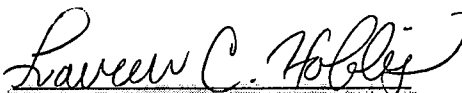
WHEREFORE, the Appellant respectfully moves this Honorable Court to extend the time to file and serve Appellant's initial brief and designation of matter by thirty (30) days.

Respectfully submitted,

WILLIAM G. YARBOROUGH III, ESQ.

LAUREN C. HOBBS, ESQ.

WILLIAM G. YARBOROUGH III, ATTORNEY AT LAW, LLC
522 North Church St., Greenville South Carolina 29601
(864) 331-1612

By: 
Lauren C. Hobbs, #103190

Greenville, SC
July 16, 2018

PROOF OF SERVICE

The undersigned hereby certifies that Appellant's motion for an extension of time to file Appellant's initial brief and designation of matter has been mailed for filing to the Honorable Jenny Abbott Kitchings by depositing it in the U.S. Mail with sufficient postage attached, addressed to:

The Honorable Jenny Abbott Kitchings,
Clerk of Court for the SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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I further certify that I have today served a copy of same on the Respondent by depositing it in the U.S. Mail with sufficient postage attached, addressed to:

Senior Assistant Attorney General John Benjamin Aplin
Office of the South Carolina Attorney General
P.O. Box 11549
Columbia, South Carolina 29211

I further certify that all parties required by this Court's rules to be served have been served.

This 16th day of July, 2018.

Sandy Ignacio
Sandy Ignacio, Administrative Assistant
William G. Yarborough III, Attorney at Law, LLC

Sworn to before me this 16
day of July, 2018

Christie Rogers
Notary Public for South Carolina

My commission expires: 02-21-2019

LAW OFFICE OF WILLIAM G. YARBOROUGH, III

522 N. Church St. Greenville, SC 29601 • Office: (864) 331-1612 • wgyarborough@gmail.com

July 16, 2018

The Honorable Jenny Abbott Kitchings, Clerk of Court
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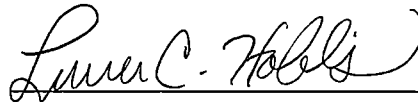
Re: State v. Jonathan S. Ostrowski, 2018-000423

Dear Ms. Kitchings,

Enclosed for filing is an original motion for extension of time to file the Appellant's initial brief and designation of matter and proof of service, along with six copies.

Should you require anything further, please do not hesitate to contact me. Thank you for your time and attention to this matter.

Sincerely,



Lauren C. Hobbis, Esquire # 103190

CC:

Mr. John Benjamin Aplin, Senior Assistant Attorney General
Office of the South Carolina Attorney General
P.O. Box 11549
Columbia, SC 29211

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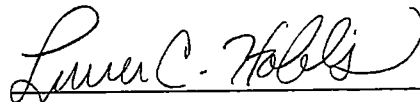
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Sincerely,



Lauren C. Hobbis, Esquire # 103190

CC:

Mr. John Benjamin Aplin, Senior Assistant Attorney General
Office of the South Carolina Attorney General
P.O. Box 11549
Columbia, SC 29211

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WILLIAM G. YARBOROUGH III
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