

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COUNTY OF PICKENS
Court of General Sessions

Perry H. Gravely, Circuit Court Judge

Appellate Case No.: 2017-002599
Indictment Nos: 2014-GS-39-02373 and 2014-GS-39-02374
Civil Action No.: 2017-CP-39-1504

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JUL 17 2018
SC Court of Appeals

The State of South CarolinaRespondent,

vs.

Ronnie Carrol Tucker,Defendant,

Bail Out Bonding (Surety),Appellant.

**NOTICE OF REPRESENTATION AND MOTION FOR PERMISSION TO FILE REPLY
BRIEF, RECORD ON APPEAL, AND APPELLANT'S FINAL BRIEF OUT OF TIME**

Undersigned Counsel hereby notifies the Court that he has been retained to take over representation of Appellant in this matter. Previously, Appellant was represented by Counsel that have now filed to be relieved. Prior counsel filed an initial brief, but have not filed a Reply Brief, the Record on Appeal or Appellant's Final Brief in this matter.

Undersigned counsel needs sufficient time to properly assess the appeal, to determine if a Reply Brief needs to be filed, to prepare and file a Reply Brief if deemed necessary, and to then prepare and file the Record on Appeal and Appellant's final brief(s). Undersigned counsel believes that 60 days should be sufficient for this request.

Accordingly, undersigned counsel hereby requests permission to file a Reply Brief, the Record on Appeal and final brief(s) out of time and that he be allotted an additional 60 days to do so. This request is not intended for the purpose of delay, but is instead necessary to allow undersigned counsel to properly assume representation of Appellant in this matter.

Date: July 13, 2018



Kenneth Gibson (S.C. Bar No. 0069288)
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Greenville, SC 29606
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Attorney for Appellant

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Office of the South Carolina Attorney General
Post Office Box 11549
Columbia, SC 29211-1549

John Baker Cleveland
Office of the 13th Circuit Solicitor
214 E. Main Street
Pickens, SC 29671

Attorneys for the Respondent

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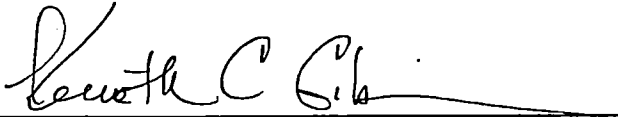
Bail Out Bonding (Surety),Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that he is a person of such age and discretion as to be competent to serve process and that on this day, he served a copy of the attached **NOTICE OF REPRESENTATION AND MOTION FOR PERMISSION TO FILE REPLY BRIEF, RECORD ON APPEAL, AND APPELLANT'S FINAL BRIEF OUT OF TIME** upon The State of South Carolina by regular mail to:

Vann Henry Gunter, Jr.
Alan M. Wilson
Office of the South Carolina Attorney General
Post Office Box 11549
Columbia, SC 29211-1549.

Date: July 13, 2018

A handwritten signature in cursive script that reads "Kenneth C. Gibson". The signature is written in black ink and extends across the width of the page.

Kenneth Gibson

Kenneth C. Gibson
Attorney at Law

220 North Main Street, Ste. 500 (29601)
Post Office Box 5536 • Greenville, SC 29606
Phone: (864) 241-6699 • Facsimile: (864) 241-6211

July 13, 2018

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

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SC Court of Appeals


RE: State of South Carolina v. Ronnie Caroll Tucker, et al.
Indictment Nos: 2014-GS-39-02373 and 2014-GS-39-02374
Civil Action No.: 2017-CP-39-1504

Dear Honorable Ms. Kitchings:

Please find enclosed the original and six (6) copies of my Notice of Representation and Motion for Permission to File Reply Brief, Record on Appeal, and Appellant's Final Brief Out of Time.

Should you have any questions please contact me at your earliest convenience.

Sincerely,


Kenneth Gibson

Enclosures

cc: Vann Hunter Gunter, Jr., Esquire

Kenneth C. Gibson
Attorney at Law

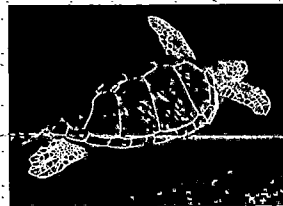
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SC Court of Appeals

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