

2nd RTB due 8/22/18

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

AUG 16 2018

APPEAL FROM THE COURT OF GENERAL SESSIONS
STATE GRAND JURY

SC Court of Appeals

THE HONORABLE CARMEN T. MULLEN, CIRCUIT JUDGE

Appellate Case No. 2018-000494

The State,

Petitioner,

v.

Richard M. Quinn, Jr.,

Respondent.

Motion for Extension of Time to File Initial Brief of Respondent

Respondent respectfully moves for a thirty-day extension of time in which to file his Initial Brief of Respondent and Designation of Matter. In support of this motion, Respondent respectfully states as follows:

1. The Initial Brief of Respondent currently is due on August 22, 2018.
2. Counsel for Respondent is working diligently to research and write the Initial Brief of Respondent but has also had another emergency commitment arise for President *Pro Tempore* Hugh K. Leatherman, on behalf of the South Carolina Senate, and consume most of July, culminating in a two-day evidentiary hearing July 30-31, 2018, in federal court on SCE&G's preliminary injunction motion against temporary rate relief passed by the General Assembly in late June for more than 700,000

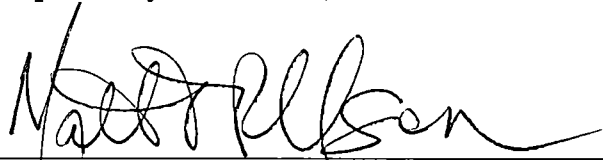
ratepayers. The federal court's denial of relief from the temporary rate is now on appeal with an expedited briefing schedule, and the first filing deadline for the undersigned counsel, on behalf of the Senate, was Wednesday, August 15.

3. This is Respondent's second request for an extension of time in which to prepare the Initial Brief of Respondent and Designation of Matter.

4. Counsel for Respondent respectfully contends, as required by Supreme Court Order No. 2009-03-18-01, *Extension Requests in Criminal Direct Appeals and Post-Conviction Relief Certiorari Proceedings*, there is good cause for granting an additional thirty-day extension of time in which to complete preparation of the Initial Brief of Respondent to allow adequate time to research and prepare the brief and Designation of Matter for filing with the Court.

5. Counsel for Respondent calculates that, if the extension is granted, the Initial Brief of Respondent and Designation of Matter would be due on or before September 21, 2018.

Respectfully submitted,



Matthew T. Richardson (S.C. Bar 15647)
WYCHE, P.A.
Post Office Box 12247
Columbia, SC 29211

Attorney for Respondent

August 16, 2018

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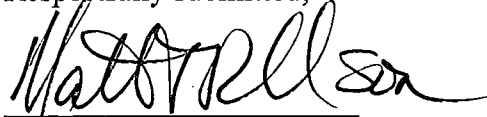
Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that on August 16, 2017, he served counsel for Petitioner with the *Motion for Extension of Time to File Initial Brief of Respondent* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following address:

David M. Pascoe
Solicitor, First Judicial Circuit
P.O. Box 1525
Orangeburg, SC 29116

Respectfully submitted,



Matthew T. Richardson
Wyche, P.A.
Post Office Box 12247
Columbia, SC 29211

August 16, 2018

ATTORNEY FOR RESPONDENT

W Y C H E

Attorneys at Law

August 16, 2018

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED

AUG 16 2018

SC Court of Appeals

Re: *State v. Quinn*, No. 2018-000494

Dear Ms. Kitchings:

Please find enclosed for filing a Motion for Extension of Time to File Initial Brief of Respondent. This is Mr. Quinn's second request for an extension of time with respect to filing Respondent's Initial Brief.

Respondent's Initial Brief currently would be due on Wednesday, August 22, 2018. The 30-day extension will result in Respondent's Initial Brief being due on Friday, September 21, 2018.

By copy of this letter, we are notifying counsel for the Appellant of this extension request.

If you have any questions or need additional information, please contact me at your convenience. I appreciate your consideration of this request.

Most respectfully,



Matthew T. Richardson
mrichardson@wyche.com

cc: Solicitor David M. Pascoe, Jr.

W Y C H E
PROFESSIONAL ASSOCIATION

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VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
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South Carolina Court of Appeals
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