

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of General Sessions

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AUG 24 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.

**SECOND MOTION FOR EXTENSION OF TIME 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

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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.

Appellant's initial brief and designation of matter are due to be filed with the Court and served upon the Respondent today, August 15, 2018. This request is made in light of Counsel's heavy caseload and the long length of the trial transcript. In regards to Counsel's current case load, Counsel has had to simultaneous draft opening briefs for United States v. Antonio Crawley, case no. 18-4073 and United States v. Everette Dawkins, case no. 18-4021, the former's appendix was over 2500 pages in length. Counsel has also been preparing for various trials previously continued and scheduled for next week.

Counsel contacted representative for the Respondent, Senior Assistant Attorney General John Benjamin Aplin, for his position on this extension request on August 14, 2018. Mr. Aplin relayed that he has no objection to motion for an extension of time.

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.

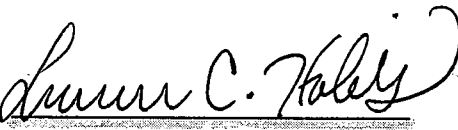
WHEREFORE, the Appellant respectfully moves this Honorable Court to extend the time to file and serve Appellant's initial brief and designation of matter by thirty (30) days.

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. Hobbis, #103190

Greenville, SC
August 15, 2018

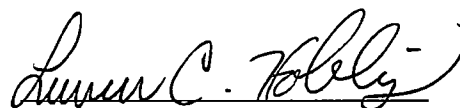
CERTIFICATE OF SERVICE

The undersigned hereby certifies that Appellant's second motion for an extension of time to file and serve the initial brief and designation of matter was served upon the Respondent, represented by Senior Assistant Attorney General John Benjamin Aplin, this day by depositing it in the U.S. postal mail with sufficient postage attached and addressed to:

Senior Assistant Attorney General John Benjamin Aplin,
SC Attorney General's Office
P.O. Box 11549
Columbia, SC 29211

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This 15th day of August, 2018.



Lauren C. Hobbis, #103190
Attorney for Appellant



WBY Law
502 N. Church St.
Greenville SC 29601

The Honorable Jerry Abbott Witting &
SC Court of Appeals
P.O. Box 11629
Columbia SC 29211

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