

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

DEC 03 2018

SC Court of Appeals

J. Derham Cole, Circuit Court Judge

CASE NUMBERS: 2016GS4203958 & 2016GS4203959

The State.....Respondent,

v.

Marcus Quante Todd.....Appellant.

MOTION TO ALLOW LATE FILING

Pursuant to Rule 203 of the South Carolina Appellate Court Rules, the undersigned attorney for Marcus Quante Todd moves to be allowed to file late. The Notice of Appeal was filed with Spartanburg County Clerk of Court's Office on September 22, 2017 which was two days after sentencing. The undersigned attorney did not follow through with the normal procedure. Her 90 year old mother was ill and the file was set aside. The Appellant was at no fault in this matter and it would be unfair to him to dismiss his Appeal due to his attorney's mistake.

Respectfully submitted,



J. Patricia Anderson
Post Office Box 1507
Spartanburg, South Carolina 29304
(864) 582-7763
Attorney for Appellant

November 29, 2018

Other Counsel of Record:
Derrick Balsa, Deputy Circuit Solicitor
Meghan Moricle, Assistant Circuit Solicitor
Spartanburg County Judicial Center
180 Magnolia Street
Spartanburg, South Carolina 29306
Attorneys for Respondent

J. PATRICIA ANDERSON
ATTORNEY AT LAW

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November 29, 2018

VIA EMAIL AND U.S. MAIL

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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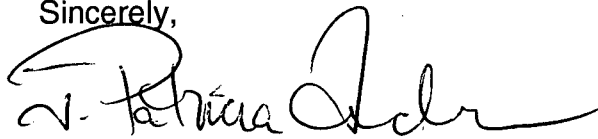
Re: The State v. Marcus Q. Todd
Appellate Case No. 2018-002024

Dear Ms. Kitchings:

Attached please find my Motion for Late Filing and my filed Notice of Appeal. If you need anything, please let me know.

Thank you for your attention to this matter.

Sincerely,



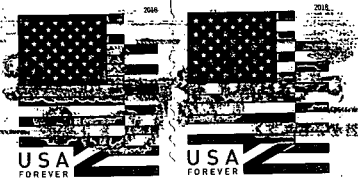
J. Patricia Anderson

CC. Alan McCrory Wilson
John Benjamin Aplin
Derrick Bruce Balsa
Robert Michael Dudek

J. PATRICIA ANDERSON
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The Honorable *Terry Abbott Kitching*
Clerk of the South Carolina Court of Appeals
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Columbia, S.C. 29211

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