

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

DEC 10 2018

SC Court of Appeals

APPEAL FROM YORK COUNTY
Court of General Sessions

Thomas L. Hughston, Jr., Circuit Court Judge

Appellate Case No.: 2017-002445

Case Nos.: 2016GS4600756, 2016GS4600757, 2017GS4600758, 2017GS4604770

The State Respondent

v.

Shawn Roseberry Bisnauth Appellant

**MOTION FOR EXTENSION TO FILE
INITIAL REPLY BRIEF OF APPELLANT**

COMES NOW, Jack B. Swerling, attorney for the Appellant, requesting an extension to file the Initial Reply Brief of Appellant. Counsel previously requested an extension of ten (10) days, which was granted and extended until December 10, 2018.

Counsel would respectfully request an additional ten (10) day extension to file the Initial Reply Brief of Appellant due to the following:

1. Counsel has been working on the Reply to Return to Petition for Writ of Certiorari in the case of State v. Washington, which is due to be filed in the South Carolina Supreme Court today.

2. Counsel has been working on objections to a lengthy Presentence Report in

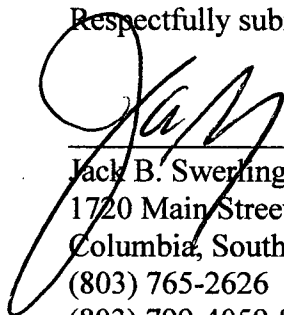
the case of United States v. Espinosa, which is due to be filed in Federal Court today.

3. Counsel has been working on a wiretap motion in the case of United States v. Smith, which is due to be filed in Federal Court today, and scheduled to be argued on December 17, 2018.

Counsel's paralegal, Kellie S. Reaves, has consulted with David A. Spencer, Senior Assistant Attorney General, and he has no objection and consents to the request by counsel.

WHEREFORE, counsel prays the Court will grant an additional ten (10) day extension to file the Initial Reply Brief of Appellant for the foregoing reasons. This would give a new deadline of December 20, 2018.

Respectfully submitted,



Jack B. Swerling
1720 Main Street, Suite 301
Columbia, South Carolina 29201
(803) 765-2626
(803) 799-4059 facsimile

Attorney for Appellant

Columbia, South Carolina
December 10, 2018

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PROOF OF SERVICE

I, Kellie Reaves, certify that I have served the Motion for Extension to File the Initial Reply Brief of Appellant on the following, by depositing a copy of it in the United States Mail, postage prepaid, on December 10, 2018, addressed to:

David A. Spencer, Senior Assistant Attorney General
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211-1549



Kellie S. Reaves
Paralegal to Jack B. Swerling
1720 Main Street, Suite 301
Columbia, South Carolina 29201
(803) 765-2626
(803) 799-4059 facsimile

*Law Offices of
Jack B. Swerling*

*1720 Main Street, Suite 301
Columbia, South Carolina 29201*

*Telephone 803-765-2626
Fax 803-799-4059*

December 10, 2018

VIA HAND-DELIVERY

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

RE: The State v. Shawn Roseberry Bisnauth
Appellate Case No.: 2017-002445

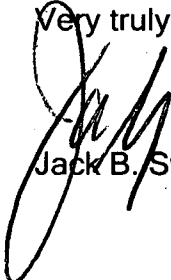
Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of the Motion for Extension to file the Initial Reply Brief of Appellant, along with the Proof of Service, in the above referenced matter.

By copy of this letter, I am serving David A. Spencer, Senior Assistant Attorney General, with a copy of same.

If you have any questions, do not hesitate to contact me.

Very truly yours,


Jack B. Swerling

JBS/ksr
Enclosures

cc: David A. Spencer, Senior Assistant Attorney General
Katherine Carruth Goode, Esquire
Shawn Roseberry Bisnauth #00323432
Terrance Bisnauth

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