

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY

R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2017-001542

**RECEIVED**  
DEC 14 2018  
SC Court of Appeals

The State, ..... Respondent,

v.

James Heyward, ..... Appellant.

**APPELLANT'S MOTION FOR SECOND EXTENSION OF TIME  
TO REPLY TO RESPONDENT'S INITIAL BRIEF**

Pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules, Appellant respectfully requests a second 10-day extension until December 27, 2018, to reply to Respondent's Initial Brief. There is good cause for this extension due to the number and complexity of issues raised in this appeal, which involves a multi-day trial on numerous criminal charges, as well as the other work obligations of the undersigned.

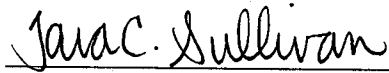
The undersigned has consulted with counsel for Respondent, and she consents to the extension. The undersigned does not expect that any further extensions will be necessary.

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December 12, 2018

Respectfully submitted,

K&L GATES, LLP



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*Attorney for Appellant James Heyward*

December 12, 2018

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**CERTIFICATE OF SERVICE**

I certify that I have served the Appellant's Motion for Second Extension of Time to Reply to Respondent's Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, on December 12, 2018, addressed to Respondent's attorney of record, Susannah R. Cole, Assistant Deputy Attorney General, South Carolina Attorney General's Office, 1000 Assembly Street, Columbia, South Carolina 29201.

K&L GATES, LLP

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*Attorneys for Appellant James Heyward*

December 12, 2018.

December 12, 2018

Tara C. Sullivan  
Tara.Sullivan@klgates.com

**By Fax and Post**

Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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**DEC 14 2018**

**SC Court of Appeals**

**Re: The State v. James Heyward  
Appellate Case No. 2017-001542**

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven copies of Appellant's Motion for Second Extension of Time to Reply to Respondent's Initial Brief and Certificate of Service in the above-referenced matter.

Please file the original and six copies of the Motion and Certificate of Service and return a clocked copy to me in the self-addressed stamped envelope enclosed for your convenience.

Thank you for your assistance with this matter. Should you have any questions, please do not hesitate to call me.

Very truly yours,

*Tara C. Sullivan*

Tara C. Sullivan

TCS/glm  
Enclosures

cc: Robert M. Dudek, Esquire  
Susannah R. Cole, Esquire  
James Heyward

