

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

Appellate Case, No. 2018-001707
Trial Court Case No.

The State, Respondent,

v.

Lorenzo Guillermo Daniel Calderon, Appellant.

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APR 23 2019

SC Court of Appeals

**APPELLANT'S second Motion for Extension of
Time to File Initial Brief**

NOW COMES Appellant Lorenzo Guillermo Daniel Calderon ("Appellant") by and through his undersigned counsel, Ms. M. Claire Hall, and respectfully moves the Court pursuant to Rule 240(a), SCACR, for a thirty day extension of time to file and serve his Initial Brief and Designation of Matter to be Included in the Record of Appeal in this case. In support thereof Appellant shows the Court the following:

1. Appellant's time for filing and serving its Initial Brief and Designation of Matter to be Included in the Record of Appeal has not expired.
2. Appellant's counsel is representing the Appellant on a pro-bono basis as part of the Appellate Practice Project, in addition to her regular practice.

3. Due to Appellant counsel's existing work schedule and demands, including meetings and conferences out of town and out of the country, Appellant respectfully contends that good cause exists for an extension of time to file his Initial Brief and Designation of Matter to be included in the Record on Appeal.

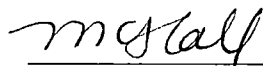
4. A thirty day extension of time for Appellant to file his Initial Brief and Designation of Matter to be included in the Record on Appeal will serve the interests of justice by allowing counsel adequate time to prepare a thorough and detailed brief in this case.

5. Appellant does not request this extension for the impermissible purpose of delay.

6. Counsel for the Appellant has consulted with counsel for the State, who consents to the request.

WHEREFORE, Appellant Lorenzo Guillermo Daniel Calderon respectfully moves the Court for a thirty day extension of time to and including May 29, 2019, to file and serve Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

April 23, 2019



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Attorneys for Appellant Lorenzo Guillermo Daniel
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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

Appellate Case, No. 2018-001707
Trial Court Case No. 2017GS4205423

The State, Respondent,

v.

Lorenzo Guillermo Daniel Calderon, Appellant.

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PROOF OF SERVICE

The undersigned hereby certifies that on April 23, 2019, she served the foregoing **APPELLANT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** on all parties listed below by placing a copy of it in the United States Mail, first class postage prepaid, addressed as follows:

John Benjamin Aplin, Esquire
Rembert Dennis Building
1000 Assembly Street, Room 519
Columbia, South Carolina 29201

Lorenzo Guillermo Daniel Calderon, #377661
Turbeville Correctional Institution
P.O. Box 252
Turbeville, South Carolina 29162

April 23, 2019

mshall

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Atlanta, GA
Charleston, SC
Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
Spartanburg, SC

April 23, 2019

Via Hand Delivery

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

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SC Court of Appeals

Re: *The State, Respondent v. Lorenzo Guillermo Daniel Calderon, Appellant*
Appellate Case No. 2018-001707

Dear Mrs. Kitchings:

Enclosed please find the original and six (6) copies of Appellant's Second Motion for Extension of Time to File Initial Brief regarding the above-referenced matter.

As evidenced by the attached Proof of Service and by copy of this letter, we are providing counsel of record with a copy of same.

With kindest regards,

Sincerely,

M. Claire Hall

MCH:bg

cc: John Benjamin Aplin, Esquire
Lorenzo Guillermo Daniel Calderon, #377661

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