

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

APR 26 2019

Upon Certiorari to the Court of Appeals

S.C. SUPREME COURT

Appeal from Berkeley County
General Sessions Court
Kristi L. Harrington, Circuit Court Judge

Case No. 2015-GS-08-01333
Appellate Case No. 2018-001878

The State,

Respondent,

v.

Sha'Quille Washington,

Petitioner.

MOTION FOR EXTENSION
TO FILE REPLY BRIEF OF PETITIONER

COMES NOW, Jack B. Swerling, attorney for the Petitioner, requesting an extension to file the Reply Brief of Petitioner, which is due to be filed and served on April 29, 2019.

Counsel would respectfully request an extension of ten (10) days to file the Reply Brief of Petitioner due to the following:

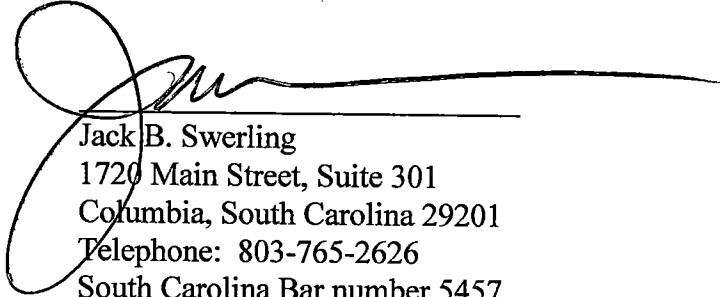
1. Counsel has been preparing for a trial that is scheduled to begin on May 6, 2019 before the Honorable Mary Geiger Lewis in the matter of United States of America vs. Santerrio Montinez Smith (Case No. 3:17-811). The trial is expected to last several weeks.

2. Counsel has a planned vacation beginning April 24, 2019 through May 3, 2019.

Counsel's paralegal, Kellie 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 a ten (10) day extension to file and serve the Reply Brief of Petitioner for the foregoing reasons. This would give a new deadline of May 9, 2019.

Respectfully submitted,



Jack B. Swerling
1720 Main Street, Suite 301
Columbia, South Carolina 29201
Telephone: 803-765-2626
South Carolina Bar number 5457

Columbia, South Carolina
April 23, 2019

THE STATE OF SOUTH CAROLINA
In the Supreme Court

Upon Certiorari to the Court of Appeals

Appeal from Berkeley County
General Sessions Court
Kristi L. Harrington, Circuit Court Judge

Case No. 2015-GS-08-01333
Appellate Case No. 2018-001878

The State,

Respondent,

v.

Sha'Quille Washington,

Petitioner.

PROOF OF SERVICE

I certify that I have served the Motion for Extension to File Reply Brief of Petitioner, by mailing a copy, postage prepaid, to counsel for Respondent, Senior Assistant Attorney General David A. Spencer, Office of the Attorney General, PO Box 11549, Columbia, South Carolina 29211, on April 23, 2019.



Kellie S. Reaves
Paralegal to Jack B. Swerling
1720 Main Street, Suite 301
Columbia, South Carolina 29201
Telephone: 803-765-2626

*Law Offices of
Jack B. Swerling*

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

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

April 23, 2019

RECEIVED

APR 26 2019

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
PO Box 11330
Columbia, SC 29211

RE: The State v. Sha'Quille Washington
Appellate Case No.: 2018-001878

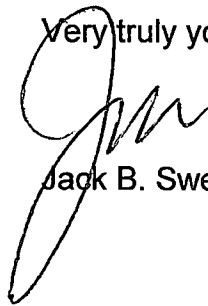
Dear Mr. Shearouse:

Enclosed for filing in the above referenced matter are the original and six copies of the Motion for Extension to File Reply Brief of Petitioner, along with the Proof of Service.

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,



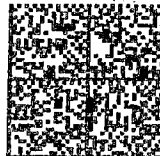
Jack B. Swerling

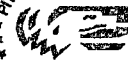
JBS/ksr
Enclosures

cc: David A. Spencer, Senior Assistant Attorney General
Katherine Carruth Goode, Esquire (via email)
Sha'Quille Washington #00365760
Melissa Washington

*Law Offices of
Jack B. Swerling
1120 Main Street, Suite 301
Columbia, South Carolina 29201*

FIRST-CLASS



*** PITNEY BOWES ***

US POSTAGE
02 1P \$ 001.75⁰
0001155856 APR 23 2019
MAILED FROM ZIP CODE 29201

The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
PO Box 11330
Columbia, SC 29211