

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of General Sessions

Larry B. Hyman, Jr., Circuit Court Judge

Appellate Case No. 2018-002056
Lower Case Nos. 2014-GS-22-00803 | 2014-GS-22-00804

The State,Respondent,

v.

Randy Collins,.....

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MAY 06 2019

APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER **SC Court of Appeals**

Pursuant to South Carolina Appellate Court Rules 240 and 263(b), Appellant Randy Collins moves for an extension of thirty (30) days from the existing deadline of May 20, 2019 to file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal in this matter based on good cause as explained below. Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal will be due on or before June 19, 2019 if the extension is granted.

Appellant respectfully submits that a thirty (30) day extension to file its Initial Brief and Designation is appropriate due to a delay in receiving the case file and trial exhibits from Court Appointed Trial Counsel for Appellant, which has delayed the review and analysis of the case.

Despite numerous attempts to obtain these documents, Court Appointed Lead Counsel for Appellant has yet to receive them.

Court Appointed Trial Counsel for Appellant's staff has indicated that the case file and trial exhibits will be provided to Court Appointed Lead Counsel for Appellant by Monday, May 6, 2019. Pending receipt of the case file and trial exhibits, Appellant does not anticipate the need for any additional extensions.

For the reasons set forth herein, Appellant requests a thirty (30) day extension to serve and file its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,



E. Brandon Gaskins (S.C. Bar No. 72374)
Moore & Van Allen PLLC
78 Wentworth Street
Charleston, SC 29401
Phone: (843) 579-7038
Facsimile: (843) 579-7099
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Court Appointed Lead Counsel for Appellant

Robert M. Dudek, Chief Appellate Defender
South Carolina Commission on Indigent Defense
Division of Appellate Defense
1330 Lady Street, Suite 401
Post Office Box 11589
Columbia, SC 29201
Phone: (803) 734-1330
Facsimile: (803) 734-1330

Co-counsel for Appellant

May 3, 2019
Charleston, SC

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The State,Respondent,

v.

Randy Collins,Appellant,

PROOF OF SERVICE

This is to certify that I have this day served counsel for the Respondent in the foregoing matter with a copy of the foregoing *Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter* by depositing the same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

Alan McCrory Wilson, Esquire
John Benjamin Aplin, Esquire
South Carolina Office of the Attorney General
Rembert Dennis Building
1000 Assembly Street, Room 519
PO Box 11549 (29211)
Columbia, SC 29201

E. Brandon Gaskins

E. Brandon Gaskins (S.C. Bar No. 72374)
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Court Appointed Lead Counsel for Appellant

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1330 Lady Street, Suite 401
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Co-counsel for Appellant

May 3, 2019
Charleston, SC

May 3, 2019

E. Brandon Gaskins
Attorney at Law

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VIA U.S. MAIL

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The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Post Office Box 11629
Columbia, SC 29211

SC Court of Appeals

Moore & Van Allen PLLC

78 Wentworth St.
Charleston, SC 29401-1428

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

Re: *The State v. Randy Collins*
Appellate Case No. 2018-002056
Lower Court Case Nos. 2014-GS-22-00803; 2014-GS-22-00804
MVA File No. NB7900.16

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find an original and seven (7) copies of Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter, and Proof of Service. Please file the original and return a filed-stamped copy to our office in the self-addressed stamped envelope provided.

Thank you for your assistance with this matter.

Sincerely,

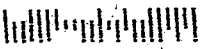
MOORE & VAN ALLEN PLLC



E. Brandon Gaskins

EBG/meh
Enclosures: as stated.

cc: Robert Michael Dudek, Esquire (*w/enclosure*)
 Alan McCrory Wilson, Esquire (*w/enclosure*)
 John Benjamin Aplin, Esquire (*w/enclosure*)
 Randy Collins (*w/enclosure*)



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