

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Georgetown County
Larry B. Hyman, Circuit Court Judge

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SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JODY WARD,

APPELLANT.

Appellate Case No.: 2018-000402

Petition to File the Initial Brief and Designation of Matter Out of Time

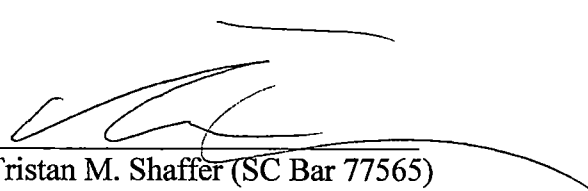
Counsel would respectfully request a to file the Initial Brief and Designation of Matter in the above-referenced case out of time. In support of this motion, counsel would respectfully show the Court the following:

1. The Initial Brief and Designation of Matter were due to be filed on April 3, 2019.
2. Counsel inadvertently scheduled this deadline on April 4, 2019.
3. Counsel discovered this scheduling mistake when attempting to prepare an extension request on April 4, 2019.
4. Counsel in now requesting to file the Initial Brief and Designation of Matter out of time.

5. A copy of the Initial Brief and Designation of Matter is attached to the mailed copy of this Petition.
6. In addition to this matter in the last month Counsel has prepared for two jury trials in circuit court which did not go forward as scheduled; prepared pre-trial motions to comply with a scheduling deadline on a capital case; argued a bench trial in General Sessions; and appeared in General Sessions for Pleas on twelve different days.
7. This request is made in good faith, and not for purposes of delay.
8. Counsel has spoken with Counsel for the State. Opposing Counsel does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request to file the Initial Brief and Designation of Matter in this case out of time.

April 22, 2019



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