

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of General Sessions

J. Derham Cole, Circuit Court Judge

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

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**RECEIVED**  
MAY 24 2019  
SC Court of Appeals

The State, Respondent,

v.

Lorenzo Guillermo Daniel Calderon, Appellant.

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

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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 his Initial Brief and Designation of Matter to be Included in the Record of Appeal has not expired and the Appellant's Initial Brief and Designation of Matter to be Included in the Record of Appeal is presently due on May 29, 2019.
2. Appellant's counsel represents the Appellant on a pro-bono basis through the South Carolina Appellate Practice Project in addition to her regular practice.

3. Counsel for the Appellant is aware the requested extension will be granted for good cause only and Appellant respectfully contends that good cause exists.

4. Appellant's counsel has been working on this case; however, counsel requires additional time to complete the Initial Brief and Designation of Matter to be included in the Record on Appeal due to continuing and new obligations to existing clients as well as required overseas and out of state travel for her practice.

5. The length of the record and complexity of issues presented requires additional time to complete a thorough and complete review of the record and preparation of the Initial Brief and Designation of Matter to be included in the Record on Appeal.

6. 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 for the Court a thorough and detailed brief in this case.

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

8. Counsel for the Appellant has consulted with counsel for the State prior to filing this motion, who has indicated his consent to the motion.

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

May 24, 2019

*[signatures on following page]*

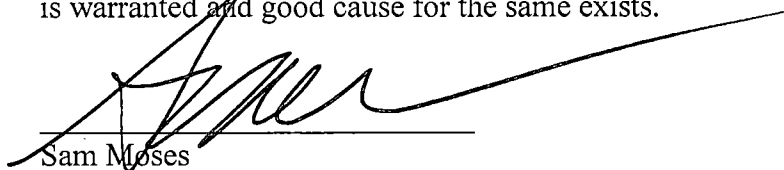
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Attorneys for Appellant Lorenzo Guillermo Daniel  
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Pursuant to order 2009-03-18-01 of the Supreme Court of South Carolina, I believe an extension is warranted and good cause for the same exists.



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Court of General Sessions

J. Derham Cole, Circuit Court Judge

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

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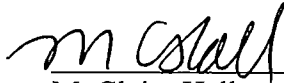
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The undersigned hereby certifies that on May 24, 2019, she served the foregoing **APPELLANT'S THIRD MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** on all parties listed below by placing a copy of it in the United States Mail, first class postage prepaid, addressed as follows:

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May 24, 2019



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