

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUN 03 2019  
SC Court of Appeals

Appeal from Horry County Court of Common Pleas  
The Honorable Perry Gravely, Circuit Court Judge

Appellate Case No. 2017-0002411

Daniel Lopez,.....Petitioner,

v.

State of South Carolina,.....Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE AND SERVE  
PETITIONER'S REPLY WITH CONSENT**

NOW COMES Petitioner, Daniel Lopez, by and through the undersigned attorney, Lauren C. Hobbs, and respectfully moves this Honorable Court to extend the time to file and serve a short Reply to Respondent's Return to the Petition for Writ of Certiorari by thirty (30) days.

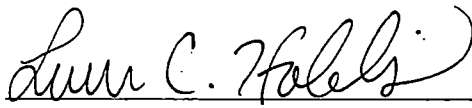
On Friday, May 24, 2019, the Undersigned emailed counsel for Respondent, Senior Assistant Deputy Attorney General William M. Blich, Jr., for Respondent's position on the extension request. On Monday, May 28, 2019, Mr. Blich graciously gave his consent to this extension request via email.

The Undersigned requests this extension because of a culmination of factors in addition to an abundance of caseload that hindered completion of Petitioner's Reply. Counsel's office has been in the process of packing all files to move to another location in the next two weeks. Also, throughout the month of May other Attorney of Record for Petitioner, William G. Yarborough III, was away on previously scheduled vacation. Additionally, Mr. Yarborough's mother passed away last week, requiring more time away from the office to be with family. A recent injury to the Undersigned's wrist has also made typing difficult and uncomfortable, causing further delay.

This extension would allow sufficient time for completion of Petitioner's Reply. Counsel respectfully submits that an extension would serve the ends of justice and Petitioner's pursuit of appeal from the denial of his post-conviction relief application.

**WHEREFORE** Petitioner respectfully requests this Honorable Court to extend the time to file and serve Petitioner's Reply to the Return to the Petition for Writ of Certiorari by thirty (30) days.

Respectfully Submitted,

By:   
LAUREN CAROLE HOBBS, S.C. Bar #103190  
William G. Yarborough III, Attorney at Law, LLC  
522 North Church St. Greenville SC 29601  
Phone: (864) 331-1612 • Fax: (864) 370-0022

Greenville, SC  
May 29, 2019



Lauren h <laurenwgylaw@gmail.com>

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**Daniel Lopez v. State**

5 messages

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**Lauren h** <laurenwgylaw@gmail.com>  
To: wblitch@scag.gov

Fri, May 24, 2019 at 4:11 PM

Mr. Blitch,

I hope this email finds you well.

I was wondering if you would have any objection to an extension to file and serve a brief reply to the return to the petition in Lopez v. State. The extension is needed because Mr. Yarborough has been away this whole this week and part of last week and I have had to cover to all hearings and matters for the both of us. I also injured my wrist which made writing for longer periods of time uncomfortable.

Thank you.  
Have a great long weekend.

Sincerely,

**Lauren C. Hobbis, Associate Attorney**  
William G. Yarborough III, Attorney at Law, LLC  
(864)-331-1612  
<https://www.wgylaw.com/>  
522 North Church Street Greenville, SC 29601

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**William Blitch** <wblitch@scag.gov>  
To: Lauren h <laurenwgylaw@gmail.com>

Tue, May 28, 2019 at 8:41 AM

Lauren,

I have no objection at all. I was running around all day Friday and out of the office yesterday, so I hope my consent is not untimely for you.

Kind regards,

William

William M. Blitch, Jr.  
Senior Assistant Deputy Attorney General  
Office of the Attorney General  
P.O. Box 11549

Columbia, SC 29211

(803) 734-3372

(803) 734-4113 (fax)

wblitch@scag.gov

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Lauren h <laurenwgylaw@gmail.com>  
To: William Blitch <wblitch@scag.gov>

Wed, May 29, 2019 at 11:41 AM

Mr. Blitch,

No problem at all, I should have sent it sooner than 4 pm on Friday and nevertheless, I really appreciate your consent to the extension, thank you! I have noted your consent in the motion that is going out today.

Thank you so much again for your consent.

[Quoted text hidden]

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[Quoted text hidden]

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Lauren h <laurenwgylaw@gmail.com>  
To: William Blitch <wblitch@scag.gov>

Wed, May 29, 2019 at 12:06 PM

I forgot to include in my email just now that the extension motion includes the passing of Mr. Yarborough's mother last week as one of the factors leading to the extension request. I did not include that in my email to you on Friday because I was unsure of the extent of my discretion in informing anyone on our cases at that time, I apologize.

Thank you.

[Quoted text hidden]

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Lauren h <laurenwgylaw@gmail.com>  
To: William Blitch <wblitch@scag.gov>

Wed, May 29, 2019 at 12:37 PM

Mr. Blitch,

One last thing, after sending out the motion to the Supreme Court, I checked the online tracker and saw the case was transferred to the Court of Appeals as of yesterday. I am just going to send the Court of Appeals the same motion but attach our emails showing your consent if that is okay. You will now receive two motions for an extension of time to file and serve the reply.

Thank you

[Quoted text hidden]

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that one (1) original Motion for Extension of Time to File and Serve Petitioner’s Reply and six (6) true copies were filed with this Court, this day, May 29, 2019, through the U.S. mail with sufficient postage attached addressed to:

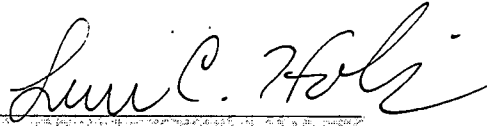
The Honorable Jenny Kitchings, Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

The undersigned further certifies that one (1) true copy of same was served upon the Respondent this day, May 29, 2019, through the U.S. mail with sufficient postage attached addressed to:

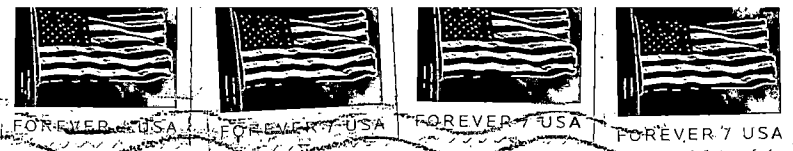
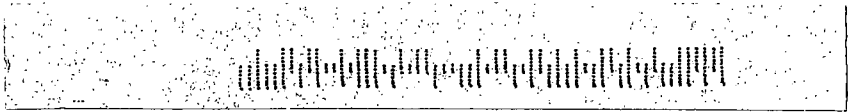
Senior Assistant Deputy Attorney General William M. Blich, Jr.  
SC Attorney General's Office  
Post Office Box 11549  
Columbia, SC 29211

The undersigned further certifies that all parties required to be served pursuant to the appellate court rules have been served.

This 29<sup>th</sup> day of May, 2019

A handwritten signature in cursive script, appearing to read "Lauren C. Hobbs".

Lauren C. Hobbs, SC Bar #103190  
William G. Yarborough III, Attorney at Law, LLC



Greenville P&DC 296  
THU 30 MAY 2019 PM

Lauren C. Hobbs, Esquire  
William G. Yarborough III, Attorney at Law LLC  
522 N. Church Street  
Greenville, SC 29601

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