

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

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Perry H. Gravely, Circuit Judge

JUL 01 2019

SC Court of Appeals

Appellate Case No. 2017-002539

The State.....Respondent,

v.

John Michael Hughes.....Appellant.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
APPELLANT'S INITIAL REPLY BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

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Appellant hereby moves pursuant to Rule 263(b), SCACR, for extension to July 26, 2019, of the time in which to serve and file Appellant's Initial Reply Brief and any accompanying Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The deadline for service and filing of Appellant's Initial Reply Brief and any accompanying Designation of Matter to be Included in the Record on Appeal is Wednesday, July 3, 2019.
2. This is the second extension of this deadline that Appellant has sought in this appeal.
3. Appellant's counsel has done substantial work on analyzing the arguments presented in the Respondent's initial brief in this case, but he does not anticipate being able to finish the reply brief by July 3. He needs to prepare for important depositions tomorrow and spend significant time drafting another document due tomorrow on a deadline in a different case. He also has a hearing on July 3.
4. The extension sought would add less than a month to the current deadline, just long enough to push this deadline beyond the Fourth of July holiday, two appeal briefing deadlines, two other significant writing deadlines of Appellant's counsel, and a crucial motion hearing set for July 10 in another case, and a two trials that are set for the week of July 15 in cases Appellant's counsel has.

5. Among other crimes, the Appellant in this case was convicted of murder, for which he was sentenced to 45 years' imprisonment. To say that the stakes are high is an understatement. The Appellant needs the best work possible done on this appeal.
6. The undersigned counsel is a private practitioner who was appointed to represent the Appellant in this case through a continuing legal education pro bono program coordinated with the Office of Appellate Defense.
7. Respondent's brief is 50 pages long – the maximum length its brief is allowed to have. Appellant's counsel needs time to draft a brief to reply adequately to it.
8. Appellant's counsel believes there is good cause to grant the requested extension of this deadline.

WHEREFORE Appellant prays for an order extending the time in which to serve and file Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal July 26, 2019.

Respectfully submitted,



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July 1, 2019

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PROOF OF SERVICE

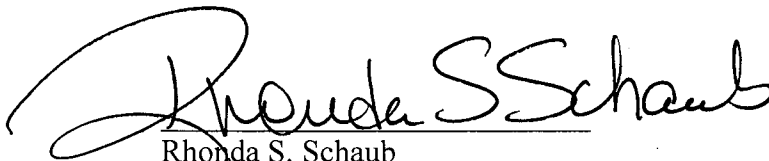
I certify that I served the foregoing motion for extension of time by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

The Hon. Alan M. Wilson
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Melody J. Brown, Esq.
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July 11, 2019