

91037

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
COMMON PLEAS COURT

EDWARD W. MILLER, COMMON PLEAS COURT JUDGE

RECEIVED  
OCT 03 2019  
SC Court of Appeals

CASE NO.: 2017-CP-23-04936  
APPELLATE CASE NO.: 2019-000882

State of South Carolina.....Appellant,

v.

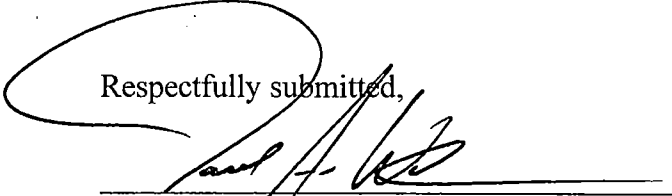
Danny Jame Plumley.....Respondent.

**MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the Respondent Danny Jame Plumley hereby moves for a thirty day extension of time in which to prepare his Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal which are currently due on or before October 4, 2019. This is the Respondent's first request for an extension of time and the Respondent certifies that this request has not been interposed to delay the case.

The Respondent asks that the deadline for filing his Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal be held in abeyance until such time as the court rules upon this Motion.

Respectfully submitted,



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David A. Wilson, S.C. Bar#65273  
Wilson & Englehardt, LLC  
200 Whitsett Street, Suite 100B  
Greenville, South Carolina 29601  
(864) 232-2329  
(864) 232-2350 (fax)  
dwilson@greenvillesclaw.com

October 1, 2019

ATTORNEY FOR RESPONDENT

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM GREENVILLE COUNTY  
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CASE NO.: 2017-CP-23-04936  
APPELLATE CASE NO. 2019-000882

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Sate of South Carolina.....Appellant,

v.

Danny Jame Plumley..... Respondent.

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**PROOF OF SERVICE**

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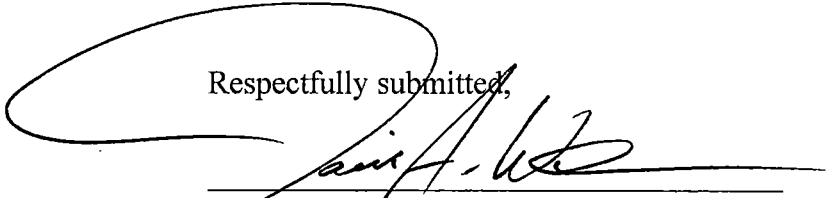
I certify that I have served the Motion for Extension of Time on Appellant by depositing a copy to them and in the United States Mail, Postage prepaid, on October 1, 2019 addressed as follows:

Haley E. Kernell, Esquire  
Greenville County Attorney's Office  
305 E North Street, Suite 325  
Greenville, SC 29601

William M. Blich, Jr., Esquire  
Joshua A. Edwards, Esquire  
S.C. Attorney General's Office  
PO Box 11549  
Columbia, SC 29211

Mitchell K. Byrd, Sr., Esquire  
114 Amber Drive  
Greenville, SC 29607

Respectfully submitted,



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Greenville, South Carolina 29601  
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(864) 232-2350 (fax)  
ATTORNEY FOR RESPONDENT

October   , 2019



**WILSON & ENGLEBARDT, LLC**  
LITIGATION • APPEALS • DISPUTE RESOLUTION

David A. Wilson  
Eric K. Englehardt

dwilson@GreenvilleSCLaw.com  
eric@GreenvilleSCLaw.com

October 1, 2019

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SC Court of Appeals

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**Re: State of South Carolina, Appellant v. Danny Jame Plumley,  
Respondent  
Appellate Case No.: 2019-000882**

Dear Ms. Kitchings:

I represent the Respondent Danny Jame Plumley in the above-referenced appeal.

We respectfully request a thirty (30) day extension to file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal. The current due date is Friday, October 4, 2019. With a thirty (30) day extension, the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal would be due on or before Monday, November 4, 2019. This is our first request for extension.

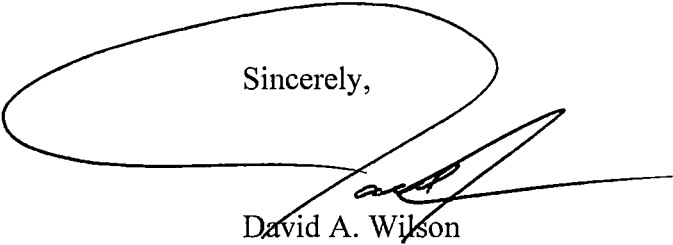
Enclosed please find the original and seven (7) copies of Respondent's Motion for Extension of Time in the above-referenced case along with the along with the proof of service upon Respondent.

Enclosed is our firm's check in the amount of \$50.00 as the required filing fee for this request. Please return the filed copies to me in the enclosed self-addressed stamped envelope.

If you have any questions or concerns, please feel free to contact me.

Thank you for your assistance.

Sincerely,



David A. Wilson

DAW/ccb

Enclosures

cc: Danny Plumley (Via Email)  
Steve W. Sumner, Esquire  
Mitchell E. Byrd, Sr., Esquire  
Haley E. Kernell, Esquire  
William M. Blich, Jr., Esquire  
Joshua A. Edwards, Esquire

Wilson & Englehardt, LLC  
206 Whitsett Street, Suite 100B  
Greenville, SC 29601

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SC Court of Appeals

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Honorable Jenny Kitchings  
South Carolina Court of Appeals  
Clerk of Court  
PO Box 11629  
Columbia SC 29211-1629