

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

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

RECEIVED

JAN 06 2020

SC Court of Appeals

The State, Respondent,

v.

Lorenzo Guillermo Daniel Calderon, Appellant.

**APPELLANT'S Motion for Extension of
Time to File a Reply Brief**

Appellant Lorenzo Guillermo Daniel Calderon ("Appellant") by and through his undersigned counsel, Ms. M. Claire Hall, respectfully moves the Court pursuant to Rule 240(a), SCACR, for a ten (10) day extension of time to file and serve any Reply Brief. In support thereof Appellant shows the Court the following:

1. Respondent served its Initial Brief by first class mail on December 18, 2019.
2. Appellant believes the time to file a Reply Brief would have expired December 30, 2019.
3. The ten (10) day period between the Appellant serving its Initial Brief and the deadline to serve a Reply Brief included the Christmas holiday and personal travel for counsel

for Appellant. Counsel for Appellant has not, and would not have by December 30, had adequate time to review Respondent's Initial Brief and prepare a Reply Brief, if any.

4. Appellant's counsel represents the Appellant on a pro-bono basis through the South Carolina Appellate Practice Project in addition to her regular practice.

5. Appellant respectfully requests the Court take into consideration the limited time permitted to file reply briefs overlapping the Christmas holiday and grant a ten (10) day extension of time for Appellant to file any Reply Brief.

6. An extension of time as requested would serve the interests of justice as allowing Appellant an opportunity to file a Reply Brief with the Court would ensure the Court is thoroughly briefed on the Issues on Appeal.

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

WHEREFORE, Appellant respectfully moves the Court for a ten (10) day extension of time to file and serve any Reply Brief, extending such deadline to January 16, 2020.

January 6, 2020



M. Claire Hall
Parker Poe Adams & Bernstein LLP
1221 Main Street, Suite 1100
Columbia, South Carolina 29201
(803) 253-8914
clairehall@parkerpoe.com

Robert M. Dudek
South Carolina Commission on Indigent Defense
Division of Appellate Defense
P.O. Box 11589
Columbia, South Carolina 29211

Attorneys for Appellant Lorenzo Guillermo Daniel
Calderon

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

J. Derham Cole, Circuit Court Judge

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

The State, Respondent,

v.

Lorenzo Guillermo Daniel Calderon, Appellant.

RECEIVED
JAN 06 2020
SC Court of Appeals

PROOF OF SERVICE

The undersigned hereby certifies that on January 6, 2020, she served the foregoing **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE A REPLY BRIEF** on all parties listed below by placing a copy of it in the United States Mail, first class postage prepaid, addressed as follows:

David Spencer, Esquire
Rembert Dennis Building
1000 Assembly Street, Room 519
Columbia, South Carolina 29201

Lorenzo Guillermo Daniel Calderon, #377661
Turbeville Correctional Institution
P.O. Box 252
Turbeville, South Carolina 29162

January 6, 2020

mcHall

M. Claire Hall
Parker Poe Adams & Bernstein LLP
1221 Main Street, Suite 1100
Columbia, South Carolina 29201
(803) 253-8914
clairehall@parkerpoe.com

Robert M. Dudek
South Carolina Commission on Indigent Defense
Division of Appellate Defense
P.O. Box 11589
Columbia, South Carolina 29211

Attorneys for Appellant Lorenzo Guillermo Daniel
Calderon