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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

JAN 29 2020

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

SC Court of Appeals

State of South Carolina.....Appellant,

v.

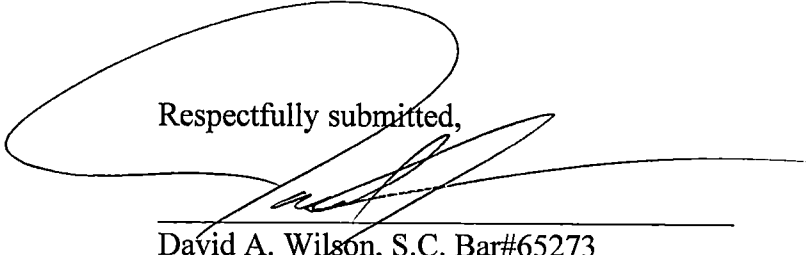
Danny Jame Plumley.....Respondent.

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 ten day extension of time in which to prepare his Final Brief of Respondent which is currently due on or before January 27, 2020. 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 Final Brief of Respondent be held in abeyance until such time as the court rules upon this Motion.

Respectfully submitted,



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

January 27, 2020

ATTORNEY FOR RESPONDENT

THE STATE OF SOUTH CAROLINA
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CASE NO.: 2017-CP-23-04936
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Sate of South Carolina.....Appellant,

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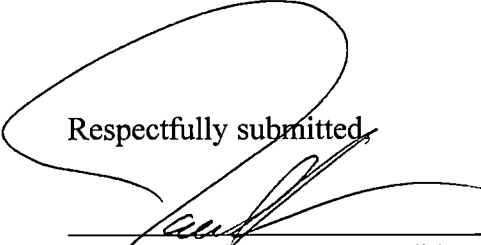
PROOF OF SERVICE

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 January 27, 2020 addressed as follows:

William W. Wilkins, Solicitor
Greenville County Attorney's Office
305 E North Street, Suite 325
Greenville, SC 29601

Alan Wilson, Attorney General
Joshua A. Edwards, Assistant Attorney General
S.C. Attorney General's Office
PO Box 11549
Columbia, SC 29211

Respectfully submitted,



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ATTORNEY FOR RESPONDENT

January 27, 2020



WILSON & ENGLEBARDT, LLC
LITIGATION • APPEALS • DISPUTE RESOLUTION

David A. Wilson
Eric K. Englehardt

dwilson@GreenvilleSCLaw.com
eric@GreenvilleSCLaw.com

January 27, 2020

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

RECEIVED
JAN 29 2020
SC Court of Appeals

**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 ten (10) day extension to file the Final Brief of Respondent. The current due date is Monday, January 27, 2020. With a ten (10) day extension, the Final Brief of Respondent would be due on or before Thursday, February 6, 2020. This is our first request for extension.

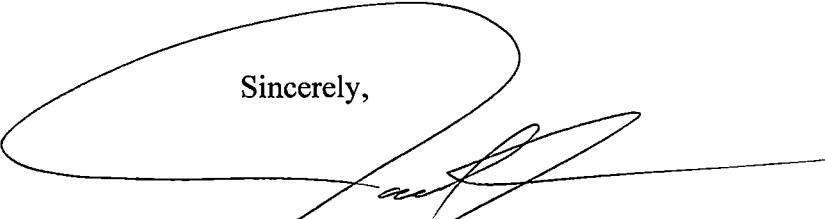
Enclosed please find the original and seven (7) copies of Respondent's Motion for Extension of Time in the above-referenced case along with the along with the proof of service upon Respondent.

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)
Joshua A. Edwards, Assistant Attorney General
William W. Wilkins, Solicitor
Alan Wilson, Attorney General

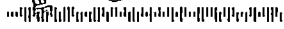
Wilson & Englebardt, LLC
200 Whitsett Street, Suite 100B
Greenville, SC 29601

SC Court of Appeals

JAN 29 2020

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Honorable Jenny Kitchings
South Carolina Court of Appeals
Clerk of Court
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