

THE STATE OF SOUTH CAROLINA  
In the Supreme Court of South Carolina

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APPEAL FROM THE STATE GRAND JURY  
Richland County  
Court of General Sessions

Carmen T. Mullen, Circuit Court Judge

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Appellate Case No. 2018-000494

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**RECEIVED**

**Apr 22 2020**

**S.C. SUPREME COURT**

The State

Appellant,

v.

Richard M. Quinn, Jr.

Respondent.

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**RESPONDENT’S FIRST MOTION FOR ADDITIONAL TIME TO FILE A RESPONSE  
TO APPELLANT’S MEMORANDUM ON THE COURT’S MARCH 12, 2020 ORDER**

Pursuant to Rules 240 and 263(b), SCACR, Respondent Richard M. Quinn, Jr. (“Respondent”), by and through his undersigned counsel, respectfully moves for the first extension of two days to file his responsive memorandum to Appellant’s memorandum in response to the Court’s Order of March 12, 2020. If the extension is granted, Respondent’s responsive memorandum will be due April 24, 2020. In support of this motion, Respondent states as follows:

1. Appellant filed the First Supplemental Record on March 20, 2020 and subsequently filed on March 23, 2020 its Memorandum in Response to the Court’s March 12, 2020 Inquiry and its Motion to Reconsider.

2. Pursuant to the Court’s March 12, 2020 Order, which was extended by subsection 1.1 of the Court’s March 20, 2020 Order Re: Operation of the Appellate Courts During the

Coronavirus Emergency, Appellate Case No. 2020-000447, Respondent's responsive memorandum is currently due April 22, 2020.

3. Respondent's counsel requires additional time to prepare a responsive memorandum. Among other things, work interruptions due to the COVID-19 emergency have caused delays in preparing Respondent's responsive memorandum.

4. This motion is made in good faith and not merely for the purpose of delay.

5. Respondent respectfully requests an extension of two days from the current deadline of April 22, 2020, which would make Respondent's responsive memorandum due on April 24, 2020. This is Respondent's first request for an extension to file a responsive memorandum.

6. Also pursuant to subsection 1.1 of the Court's March 20, 2020 Order Re: Operation of the Appellate Courts During the Coronavirus Emergency, Appellate Case No. 2020-000447, no filing fee is required for this motion for additional time.

WHEREFORE, Respondent respectfully requests an extension to Friday, April 24, 2020, to file his responsive memorandum.

Respectfully submitted,

/s MATTHEW RICHARDSON

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April 22, 2020