

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2017-CP-23-05529

State of South Carolina ex rel. W. Walter Wilkins, III,
Solicitor, Thirteenth Judicial Circuit.....Respondent,
David Green.....Appellant.

MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER

The undersigned counsel would respectfully request a thirty (30) day extension in which to file the Initial Brief of Respondent in the above reference case. In support of this motion, counsel would respectfully show the Court the following:

Respondent's Initial Brief is due Monday, April 13, 2020.

Due to the professional interruption and quarantine from the COVID-19 pandemic, counsel is unable to timely complete the Initial Brief of Respondent and Designation of Matter in this proceeding. Thus, counsel is requesting an extension of time in which to file the Initial Brief and Designation of Matter. This request is made in good faith, and not for the purpose of delay.

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SC Court of Appeals

Wherefore, premises considered, counsel hereby respectfully requests a thirty (30) day extension of time to serve and file the Initial Brief of Respondent and Designation of Matter.

Respectfully submitted,



Jonathan M. Gregory, Esq.
Thirteenth Circuit Solicitor's Office
305 East North Street, Suite 325
Greenville, South Carolina 29601
(864)467-8647
Fax: (864) 467-8610
Attorney for Respondent

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The Honorable Alex Kinlaw, Jr., Circuit Court Judge

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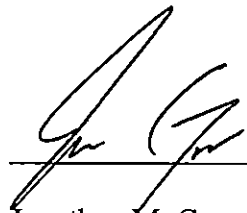
State of South Carolina ex rel. W. Walter Wilkins, III,
Solicitor, Thirteenth Judicial Circuit.....Respondent,
David Green.....Appellant.

PROOF OF SERVICE

I, Jonathan M. Gregory, counsel for the Respondent, certify that I have served two (2) copies of the within motion for an extension to file Initial Brief of Respondent and Designation of Matter via U.S. mail to David Green, Inmate Number 300923-0355, Greenville County Detention Center, 20 McGee Street, Greenville, South Carolina 29601.

I further certify that all parties required by Rule to be served have been served.

This 6th day of April, 2019.



Jonathan M. Gregory, Esq.
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State of South Carolina
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Solicitor
W. Walter Wilkins

April 6, 2020

Greenville County Courthouse
305 E. North Street, Suite 325
Greenville, SC 29601-2185

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SC Court of Appeals

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: State of South Carolina ex rel, W. Walter Wilkins, III,
Solicitor, Thirteenth Judicial Circuit v. David Green
Appeal from Greenville County
Appellate Case No. 2018-001462

Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of the Respondent's Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter, together with Proof of Service, in the above-referenced matter.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan M. Gregory".

Jonathan M. Gregory
Attorney for Respondent

Enclosures

cc: David Green (w/two copies of encls.)

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SC Court of Appeals

W. WALTER WILKINS, SOLICITOR
Thirteenth Judicial Circuit
Greenville County Courthouse
305 E. North Street, Suite 325
Greenville, SC 29601-2185

The Honorable Jenny A. Kitchings
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