

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ABBEVILLE COUNTY
Court of General Sessions
R. Scott Sprouse, Circuit Court Judge

RECEIVED
Jun 29 2020
SC Court of Appeals

Appellate Case No. 2019-000454

Brandon Moore, Appellant.

v.

State of South Carolina, Respondent.

Motion to Extend Time to File Initial Reply Brief of Appellant

On May 19, 2020, the State filed its Initial Brief of Respondent. By written order dated June 19, 2020, this Court extended the deadline until June 29, 2020. Brandon Moore moves this Court for an order extending time to file the Initial Brief of Appellant until Thursday, July 9, 2020. This request is based on undersigned counsel's other professional obligations and not intended for delay.

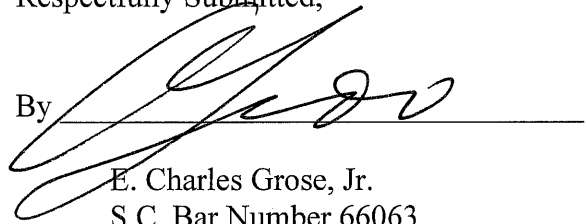
On June 10, 2020, undersigned counsel filed a petition for rehearing in *State v. Durant*, Supreme Court Appellate Case No. 2016-001264. On June 15, 2020, undersigned counsel filed an opening brief in the Fourth Circuit Court of Appeals in *Etheredge v. Nichols*, No. 20-6637. On June 17, 2020, undersigned counsel filed a response to a motion for summary judgment in *Tucker v. City of Greenwood*, C/A No: 8:19-cv-02078-DCC-KFM in the United States District Court for the District of South Carolina. On June 25, 2020 counsel filed a reply to a petition for a writ of certiorari in *Bryant v. State*, Appellate

Case No. 2019-000610, which is a capital post-conviction relief case. Now that the pleading in *Bryant* is complete, counsel can devote time to competing this brief. Counsel does not anticipate needing any additional extensions.

IT IS SO MOVED.

Respectfully Submitted,

By

A handwritten signature in black ink, appearing to read 'E. Charles Grose, Jr.', is written over a horizontal line.

E. Charles Grose, Jr.
S.C. Bar Number 66063
The Grose Law Firm, LLC
404 Main Street
Greenwood, SC 29646
(864) 538-4466
(864) 538-4405 (fax)
Email: charles@groselawfirm.com

Attorney for the Appellant

June 29, 2020
Greenwood, South Carolina

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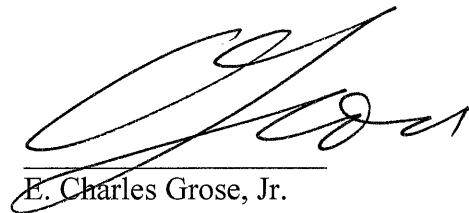
v.

State of South Carolina, Respondent.

Certificate of Service

I certify that I have served this pleading on the State of South Carolina by emailing a copy on the date reflected below placing a copy in the United States Mail, postage prepaid, on the date reflected below,¹ addressed as follows:

Mark R. Farthing, Esquire
S.C. Attorney General's Office
PO Box 11549
Columbia, SC 29211



E. Charles Grose, Jr.
The Grose Law Firm, LLC
404 Main Street
Greenwood, SC 29646
(864) 538-4466

June 29, 2020
Greenwood, South Carolina

¹ The pleading will be placed in the mail on June 29, 2020, although it likely will be post-marked on June 30, 2020.

The Grose Law Firm, LLC
404 Main Street, Greenwood, South Carolina 29646

E. Charles Grose, Jr.
Phone: 864-538-4466 Fax: 864-538-4405
E-mail: charles@groselawfirm.com
Web: GroseLawFirm.com

June 29, 2020

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

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SC Court of Appeals

Re: *State of South Carolina v. Brandon Moore*
Appellate Case No. 2019-000454

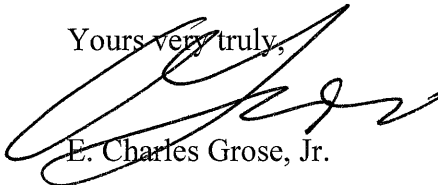
Dear Ms. Kitchings:

Enclosed please find Mr. Moore's Petition to Extend Time to File his Initial Reply Brief of Appellant, along with a certificate of service.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

With kindest regards, I am

Yours very truly,



E. Charles Grose, Jr.

cc: Mark R. Farthing, Esquire