

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions
Letitia Verdin, Circuit Court Judge

Nov 13 2020
SC Court of Appeals

Appellate Case No. 2020—001122

The State.....Respondent,

v.

Marquez D. Glenn.....Appellant.

MOTION FOR EXTENSION OF TIME TO FILE

Appellant hereby moves the Court for a Thirty (30) day extension of time in which for Appellant to file his Initial Brief and the Designation of Matter to be Included in the Record on Appeal. This Motion is being made in good faith and for good cause due to an unexpected staffing change at undersigned counsel's law firm during the last Thirty (30) days. As previously noted, this appeal raises novel issues of law regarding the Protection of Persons and Property Act, S.C. Code Ann. §16-11-410 et seq., which undersigned counsel has continued to diligently research, work on, and incorporate into the presentation of this appeal. However, after requesting the prior extension and expecting it to be sufficient to complete and file Appellant's Initial Brief and the Designation of Matter to be Included in the Record on Appeal, my firm's longtime and sole associate attorney informed my partner and undersigned counsel that he was

moving from our firm to another firm in the Greenville area. As a result of this unexpected and extraordinary development, I not only no longer had the assistance of my associate on this appeal, or for that matter other cases that require attention while I am focusing my time and attention on this appeal, but also my partner and I were inundated with taking over, getting up to speed on, and performing any immediately necessary action items for all of the cases on which our associate had been lead counsel. Accordingly, due to this exceptional and unforeseen event, undersigned counsel requires the requested extension to finish the drafting process and to properly present to the Court the novel issues of law that are central to this appeal. This Motion is not interposed for purposes of delay, but is the result of the unforeseen and unexpected departure of one of my firm's three attorneys and is necessary for the appropriate development of the appeal.

Respectfully submitted,

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PROOF OF SERVICE

I certify that I have served Appellant's Request for Extension of Time to File on Respondent State of South Carolina by emailing a copy of it on Friday, November 13, 2020 to attorney of record William M. Blicht, Jr. at wblitch@scag.gov.

Respectfully submitted,

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Greenville, South Carolina
November 13, 2020