

**The South Carolina Court of Appeals**

**The State**

**v.**

**John D. Haynes, Jr.**

**Appellate Case No.: 2020-000502**

**RECEIVED**

**DEC 29 2020**

**SC Court of Appeals**

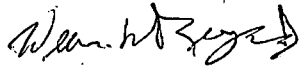
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**MOTION To File Initial Brief Out of Time**

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The Appellate above named, hereby respectfully MOVES to be allowed to file his Initial Brief Out of Time due to the communication difficulties occasioned by the Appellants contraction of covid 19 virus within the South Carolina Department of Corrections, And IT Is So MOVED this 23<sup>rd</sup> day of December, 2020.

Respectfully submitted,



**s/William L. Runyon, Jr.**

William L. Runyon, Jr., Esquire  
#3 Gamecock Avenue Suite #303  
Charleston, SC 29407  
(843) 571-3515

**The South Carolina Court of Appeals**

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**Certificate Of Mailing**

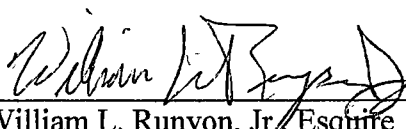
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This is to certify that the Motion To File Initial Brief Out of Time herein was mailed with good and sufficient postage on the 23rd day of December, 2020 to the following to their known address:

Hon. Alan M. Wilson, Esquire  
S.C. Attorney General  
100 Assembly Street  
Columbia, SC 29201

Hon. William M. Blitch, Esquire  
S.C. Attorney General  
100 Assembly Street  
Columbia, SC 29201

Hon. Michael Thomas Spears, Esquire  
Assistant Solicitor For Dorchester County  
140 N. Main Street, Suite 102  
Summerville, SC 29483

  
\_\_\_\_\_  
William L. Runyon, Jr., Esquire  
Attorney for Plaintiff's  
#3 Gamecock Avenue, Ste. 303  
Charleston, SC 29407  
(843) 571-3515

Dated this 7th day of, 2017  
At Charleston, SC 29407

#3 Gamecock Avenue, Suite 303  
Charleston, South Carolina 29407  
(843) 571-3515  
(843) 766-5085 FAX

**William L. Runyon, Jr.**  
**Attorney At Law**

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December 23, 2020

The South Carolina Court of Appeals  
ATTN: Hon. V. Claire Allen, Clerk/Ms. Jacklyn Orr  
P.O. Box 11629  
1220 Senate Street  
Columbia, SC 29201

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SC Court of Appeals

By Fax and Regular Mail (803) 734-1890)

Re: The State vs. John D. Haynes, Jr.  
Appellate Case No: 2020-000502

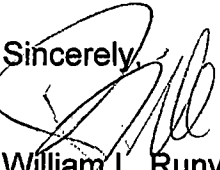
Dear Ms. Orr:

In response to your letter of December 15, 2020 in re the Transcript issue concerning the above this is to advise as follows:

1. The Final Transcript of (2) Two re the above in fact received by email October 6, 2020 at 12:52 pm.
2. Mr. Haynes was diagnosed with the covid 19 virus in the Department of Corrections during October – November. This made communications difficult.

Therefore, I have enclosed a Motion to file the Initial Brief out of Time. Thanking you for any consideration, I remain With Best Wishes,

Sincerely,

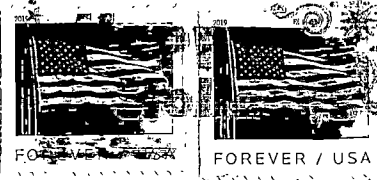
  
William L. Runyon, Jr.

CC: Alan McCrory Wilson, Esquire  
William M. Blotch, Jr., Esquire  
Michael Thomas Spears, Esquire

William L. Runyon, Jr., Esquire  
# 3 Gamecock Avenue  
Suite 303  
Charleston, SC 29407

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SC Court of Appeals

The South Carolina Court of Appeals  
ATTN: Hon. V. Claire Allen, Clerk/Ms. Jacklyn  
Orr  
P.O. Box 11629  
1220 Senate Street  
Columbia, SC 29201

29201-376333

