

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
COURT OF GENERAL SESSIONS

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R. Lawton McIntosh, Circuit Court Judge

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Case No.: 2011-GS-04-1022  
2010-GS-04-2259  
2010-GS-04-2260

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APR 05 2013

Raphael Davon Parks.....Appellant,

SC Court of Appeals

v.

State of South Carolina.....Respondent.

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MOTION FOR AN EXTENSION OF TIME

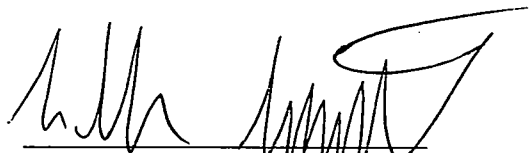
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Comes now the undersigned attorney, William N. Epps III, hereby moves for an extension of time in which to file Appellant's initial brief in accordance with Rule 208, SCACR. This Motion is based on the grounds that the undersigned attorney was not counsel of record for the Appellant during the immunity hearing that is the subject of this appeal. Additionally, my current trial schedule has prevented me time to thoroughly prepare Appellant's initial brief. Further, I was notified by the Anderson County Solicitors Office that the case of State v. Devin Nimmons would be the first case for trial on the trial docket for the week of April 22, 2013. I represent the Defendant Nimmons in that case, who is charged with burglary first degree, armed robbery and kidnapping. I also have a trial scheduled in the case of State v. Charlie Robinson on May 13, 2013. I represent the Defendant Robinson in that case, who is charged with murder, armed robbery and possession of a weapon during a violent crime.

The Appellant's initial brief and designation of matter is currently due on April 6, 2013. The undersigned is preparing the initial brief however, because of my current and upcoming trial schedule, I am unable to properly prepare Appellant's initial brief by April 6, 2013. Therefore, the undersigned attorney would ask for a sixty (60) day extension to file Appellant's initial brief and designation of matter. I have spoken to opposing counsel, Don Zelenka and he has no objection to this extension of time.

Therefore, the undersigned attorney, William N. Epps III, respectfully requests a sixty (60) day extension of time in which to file the Appellant's initial brief pursuant to Rule 208, SCACR. This Motion for extension of time is made pursuant to Rule 263, SCACR.

April 3, 2013



William Norman Epps III  
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ATTORNEY FOR APPELLANT

Other Counsel of Record:

Rame L. Campbell,  
Joshua B. Allen  
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Raphael Davon Parks.....Appellant.

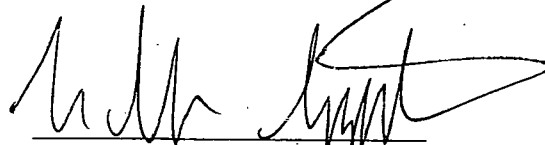
v

State of South Carolina.....Respondent,

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time, on Rame L. Campbell, Assistant Solicitor for the State of South Carolina, Joshua B. Allen Assistant Solicitor for the State of South Carolina and Don Zelenka, Senior Assistant Deputy Attorney General by depositing a copy of it in the United States Mail, with postage prepaid, on April 3, 2013 addressed to Rame L. Campbell, Assistant Solicitor for the State of South Carolina, Joshua B. Allen, Assistant Solicitor for the State of South Carolina, Post Office Box 8002, Anderson, South Carolina and Don Zelenka, Senior Assistant Deputy Attorney General, 1000 Assembly Street, Columbia, SC 29201.

April 3, 2013



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WILLIAM N. EPPS, JR.  
SAMANTHA P. NELSON  
WILLIAM N. EPPS, III  
CLIFTON M. SAMS  
*\*Also Admitted in Georgia*

March 8, 2013

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

Re: The State vs. Raphael Davon Parks  
2011-GS-04-1022  
2010-GS-04-2259  
2010-GS-04-2260  
Our File No.: CR12-2286

**RECEIVED**

APR 05 2013

**SC Court of Appeals**

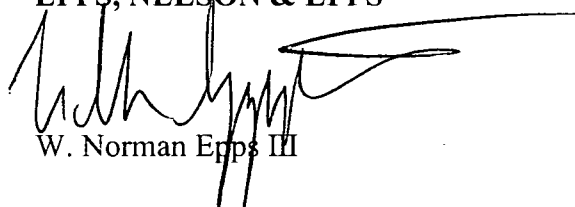
Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of the Motion for Extension of Time to file Appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal and the original and (1) copy of my Proof of Service in regards to the above referenced matter.

With kind regards, I am

Sincerely yours,

**EPPS, NELSON & EPPS**



W. Norman Epps III

WNEIII:lll

cc: Rame L. Campbell, Assistant Solicitor  
Joshua B. Allen, Assistant Solicitor  
Don Zelenka, Senior Assistant Deputy Attorney General