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Jun 06 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY  
Court of General Sessions

R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2021-000615

The State of South Carolina ,

Respondent,

v.

Lucretia Conyers,

Appellant.

**Petition to File the Initial Brief and Designation of Matter Out of Time**

Counsel would respectfully request a to file the Initial Brief and Designation of Matter in the above-referenced case out of time. In support of this motion, counsel would respectfully show the Court the following:

1. Pursuant to an order filed on March 7, 2022, the Initial Brief and Designation of matter were due to be filed on March 30, 2022.
2. Counsel has reviewed his calendar for March 30, 2022 and it appears that Counsel must have failed to calendar this deadline.
3. Counsel learned of this mistake when he was contacted by the clerk's office concerning this case.
4. Counsel is finalizing his Initial Brief and intends on filing it today.
5. This request is made in good faith, and not for purposes of delay.
6. Counsel has spoken with Counsel for the State. Opposing Counsel does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request to file the Initial Brief and Designation of Matter in this case out of time.

June 6, 2022

s/ Tristan M. Shaffer

Tristan M. Shaffer (SC Bar # 77565)

P.O. Box 1027

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tristan@shafferlawsc.com

Attorney for Appellant

Other Counsel of Record:  
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Attorney for Respondent

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Certificate of Service

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I certify that on the date below I served the Petition to file the Initial Brief and Designation of Matter Out of Time on Respondent by e-mailing a copy to Respondent at [wblitch@scag.gov](mailto:wblitch@scag.gov).

June 6, 2022

s/ Tristan M. Shaffer

Tristan M. Shaffer (SC Bar # 77565)  
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Chapin, SC 29036  
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Attorney for Appellant

Other Counsel of Record:  
Mr. William M. Blich, Jr.  
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(803) 734-3727  
Attorney for Respondent



Tristan Shaffer <tristan@shafferlawsc.com>

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**State v. Lucretia Conyers 2021-000615**

1 message

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**Tristan Shaffer** <tristan@shafferlawsc.com>  
To: William Blitch <wblitch@scag.gov>

Mon, Jun 6, 2022 at 8:51 AM

William,  
Please find the attached Petition which is being served on you.

Tristan

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 **Out of time petition.pdf**  
114K