

IN THE SUPREME COURT OF OHIO

STATE OF OHIO,

Plaintiff-Appellee,

v.

BRANDON MOORE,

Defendant-Appellant.

CASE NO. 2014-0120

ON DISCRETIONARY APPEAL
FROM THE MAHONING
COUNTY COURT OF APPEAL,
SEVENTH APPELLATE DISTRICT,
CASE NO. 08MA20

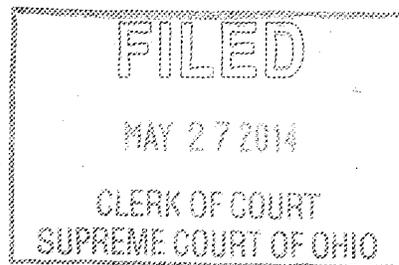
**STIPULATED MOTION FOR EXTENSION OF TIME FOR APPELLANT TO FILE
OPENING BRIEF UNDER S.CT.PRAC.R. 3.03(B)(2)(a)**

Rachel S. Bloomekatz (0091376)
Kimberly A. Jolson (0081204)
JONES DAY
325 John H. McConnell Boulevard, Suite 600
P.O. Box 165017
Columbus, Ohio 43216-5017
(614) 469-3919
(614) 461-4198 (fax)

Attorneys for Appellant Brandon Moore

Ralph Rivera (0082063)
Assistant Prosecuting Attorney
Mahoning County Prosecutor's Office
21 W. Boardman Street, 6th Floor
Youngstown, Ohio 44503
(330) 740-2330
(330) 740-2008 (fax)

Attorney for Appellee State of Ohio

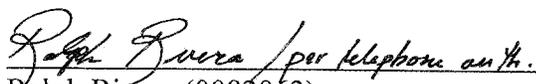


Appellant, Brandon Moore, and Appellee, State of Ohio, pursuant to a stipulation of the parties, hereby respectfully request that the Court extend the time for Appellant to file his merits brief by twenty days, as provided in S.Ct.Prac.R. 3.03(B)(2)(a). Rule 3.03(B)(2)(a) states that “parties may stipulate to extensions of time to file merit briefs” and that “[e]ach party may obtain in a case only one stipulated extension of time not to exceed twenty days.” Appellant has not received any prior extensions of filing deadlines. The parties have stipulated to an extension of twenty days for Appellant to file his opening merits brief. With the agreed extension, the new deadline for Appellant to file his opening merits brief is July 14, 2014.

Respectfully submitted,


Rachel S. Bloomekatz (0091376)
Kimberly A. Jolson (0081204)
JONES DAY
325 John H. McConnell Boulevard, Suite 600
Columbus, Ohio 43216-5017
(614) 469-3919 (tel.)
(614) 461-4198 (fax)

Attorneys for Appellant Brandon Moore

 *per telephone auth.* 
Ralph Rivera (0082063)
Assistant Prosecuting Attorney
Mahoning County Prosecutor's Office
21 W. Boardman Street, 6th Floor
Youngstown, Ohio 44503
(330) 740-2330
(330) 740-2008 (fax)

Attorney for Appellee State of Ohio

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Stipulated Motion for Extension of Time was served by regular, U.S. Mail, postage prepaid, to Ralph Rivera, Esq., Assistant Mahoning County Prosecutor, 21 W. Boardman Street, 6th Floor, Youngstown, Ohio 44503, on this 27th day of May, 2014.



Rachel S. Bloomekatz