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Feb 03 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of General Sessions

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2022-000487
Case No.: 2020-GS-04-00823

The State..... Respondent

v.

Keland Alexander Marqui Hailey..... Appellant

MOTION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL

COMES NOW, Jack B. Swerling, attorney for the Appellant, requesting an extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal.

Counsel would respectfully request an additional thirty day extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal due to the following:

1. Counsel has been preparing for a murder trial scheduled to begin on February 13, 2023 in Lancaster County (State v. Chavis).

2. Counsel has been preparing for a murder trial scheduled to begin on March 13, 2023 in Lexington County, and expected to last two weeks (State v. Leon).

3. Counsel has been working on an appellate brief due this week to the South Carolina Court of Appeals (State v. Pollock), which was filed on February 1, 2023.

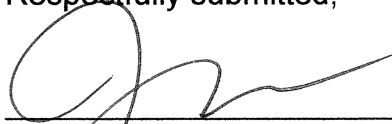
4. Counsel had several deadlines due the past couple of weeks, including objections to federal presentence investigation reports (USA v. Green) (USA v. Hammond).

5. Counsel has been preparing an Order in a post conviction relief matter (Styla v. State).

Counsel's paralegal, Kellie S. Reaves, has consulted with Melody J, and he has no objection and consents to the request by counsel.

WHEREFORE, counsel prays the Court will grant an additional thirty day extension to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal for the foregoing reasons. This would give a new deadline of March 8, 2023.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jack B. Swerling', written over a horizontal line.

Jack B. Swerling
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Attorney for Appellant

Columbia, South Carolina
February 3, 2023

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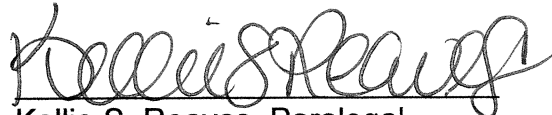
v.

Keland Alexander Marqui Hailey Appellant

PROOF OF SERVICE

I, Kellie S. Reaves, certify that I have served the Motion for Extension to File Initial Brief of Appellant and Designation of Matter to Be Included In the Record on Appeal on February 3, 2023 by email to the following:

Melody J. Brown, Esquire
mbrown@scag.gov



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Columbia, South Carolina
February 3, 2023