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Mar 07 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 has previously requested several extensions, and the current deadline for the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal is on March 8, 2023.

Counsel respectfully requests an additional extension of thirty days to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on

Appeal due to the following:

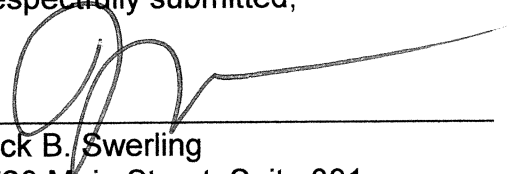
1. Counsel was diagnosed with COVID-19 last month, and missed several days from work.
2. Counsel was preparing for a murder trial scheduled on February 13, 2023 in Lancaster County that resulted in a plea on that date (State v. Chavis).
3. Counsel has been preparing for a murder trial scheduled to begin on March 13, 2023 in Lexington County, and expected to last two weeks (State v. Leon).
4. 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. Brown, Senior Assistant Deputy Attorney General, and she has no objection and consents to the request by counsel.

WHEREFORE, for good cause shown, counsel respectfully requests a thirty day extension of time to serve and file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal. This request is made in good faith, and not for the purposes of delay.

[Signatures appear on the following page.]

Respectfully submitted,



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South Carolina Bar No. 5457
Attorney for Appellant

Columbia, South Carolina
March 7, 2023

I support the finding of good cause and believe the extension is warranted.



Alissa L. Wilson
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Columbia, South Carolina
March 7, 2023

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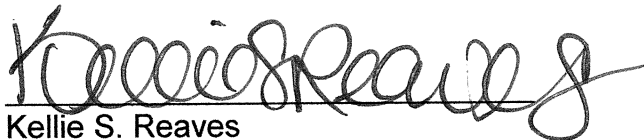
v.

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 March 7, 2023 by email to the following:

Melody J. Brown, Esquire
mbrown@scag.gov



Kellie S. Reaves
Paralegal to Jack B. Swerling
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Columbia, South Carolina
March 7, 2023