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Mar 08 2023
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Honorable Carmen T. Mullen, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JIOVAANI ARANZA GALLEGOS,

APPELLANT

APPELLATE CASE NO. 2021-000689

MOTION FOR AN EXTENSION OF TIME TO
SERVE AND FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for Jiovaani Aranza Gallegos respectfully requests a **fourth and final thirty (30) day extension from March 8, 2023, until April 7, 2023**, in which to serve and file the initial brief of appellant and designation of matter in the above-referenced case. This is a fourth request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed with the Court today.
2. Counsel for Jiovaani Aranza Gallegos respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.
3. Counsel filed the initial brief of appellant and designation of matter in the case of

The State v. Andre Covington with the Court of Appeals on February 23, 2023. Counsel filed the petition for rehearing in the case of The State v. Jason Edwin Stoots with the Court of Appeals on February 22, 2023. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ashley Prior v. The State with the Supreme Court on February 9, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Shannon Bone with the Court of Appeals on February 7, 2023. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Adonis Williams v. The State with the Supreme Court on February 3, 2023. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Robert Bailey with the Court of Appeals on January 18, 2023. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Jonathan Duncan with the Supreme Court on December 9, 2022. Counsel filed the brief of appellant and designation of matter in the case of The State v. Jeffery Truesdale with the Court of Appeals on December 8, 2022.

4. Counsel makes this request in good faith and not for purpose of delay.

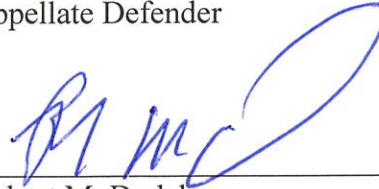
5. On February 28, 2023, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through March 31, 2023.

WHEREFORE, the undersigned counsel respectfully requests a **fourth and final thirty (30) day extension from March 8, 2023, until April 7, 2023**, in which to serve and file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

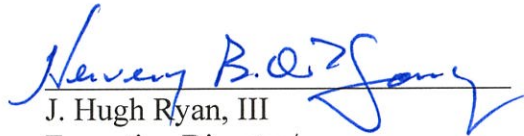
Respectfully submitted,



Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training Director

This 8th day of March, 2023.

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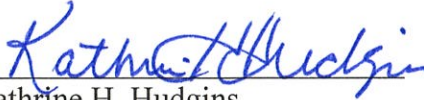
JIOVAANI ARANZA GALLEGOS,

APPELLANT

APPELLATE CASE NO. 2021-000689

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the motion for extension of time to serve and file the initial brief of appellant and designation of matter in the above-referenced case has been served upon William M. Blicht, Jr., Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 8th day of March, 2023.


Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR APPELLANT

From: [Stock, Chris](#)
To: [SC - BLITCH WILLIAM](#); [SC - COLLINS CAROLINE](#)
Cc: [Hudgins, Kathrine](#)
Subject: Aranza-Gallegos, J. - 4th Request for Extension for Initial Brief of Appellant - 2021-000689
Date: Wednesday, March 8, 2023 1:01:00 PM
Attachments: [Aranza-Gallegos, J. - 4th Request for Extension for Initial Brief of Appellant - 2021-000689.pdf](#)

Mr. Blitch,

Please find attached the Request for 4th Extension for Initial Brief of Appellant and Designation of Matter for Giovaani Aranza-Gallegos' appeal which will be filed today with the Court of Appeals.

Thank you.

Chris

Chris Stock
Administrative Assistant
Commission on Indigent Defense
Appellate Division
(803) 734-1330