

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Greenville County
Robin B. Stillwell, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

CHARLES HAMMONS,

RECEIVED
JUL 30 2013

APPELLANT

APPELLATE CASE NO. 2011201887

SC Court of Appeals

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

Counsel for Charles Hammons respectfully requests a **final thirty (30) day extension, until August 28, 2013**, in which to file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fifth request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. The Court has granted counsel four previous extensions.
2. Counsel for Charles Hammons respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.


3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ronald Cohens v. State of South Carolina with the Supreme Court on July 24, 2013. Counsel filed petition for writ of certiorari in the case of Donald C. Brevard v. State of South Carolina with the Court of Appeals on July 17, 2013. Counsel filed the petition for rehearing in the case of The State v. Richard Burton Beekman with this Court on July 11, 2013. Counsel filed the petition for rehearing in the case of The State v. David Tyre with this Court on July 11, 2013. Counsel filed the Brief of Appellant in the case of The State v. Tina Dockery in this Court on July 9, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Roosevelt Kadeem Workman with this Court on July 5, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Randy Jennings v. State of South Carolina with the Supreme Court on July 5, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Forrest Kelly Samples with this Court on June 28, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Miller with this Court on June 19, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Benjamin Davis v. State of South Carolina with the Supreme Court on June 19, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derek S. Carter v. State of South Carolina with the Supreme Court on June 14, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Carlos Lamonte McJimpsey with this Court on June 12, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Taurus L. Thompson with this Court on June 12, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. James Tyner with this Court on June 7, 2013. Counsel had an oral argument in the case of The State v. David Tyre in this Court on June 5, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Bobby M. Shaw v. The State with the Supreme Court on June 5, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Curtis McKie with this Court on May 29, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Andre Green with this Court on May 28, 2013.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

5. Counsel for the Attorney General's office consents to this request shown by signature below.

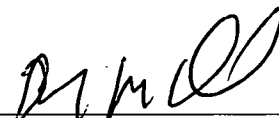
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until August 28 2013**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

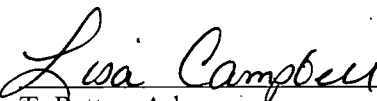


Carmen V. Ganjehsani
Appellate Defender

Attorney for Appellant



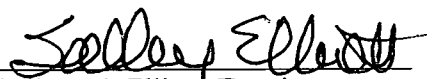
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director/
J. Hugh Ryan, III
General Counsel

This 29th day of July, 2013.

I consent:



Salley W. Elliott, Esquire



SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

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Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

July 29, 2013

RECEIVED

JUL 29 2013

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Dear Mr. Shearouse:

In absence of Hugh Ryan, Deputy Attorney and General Counsel for the South Carolina Commission on Indigent Defense, and Patton Adams, Executive Director of the South Carolina Commission on Indigent Defense, and pursuant to instructions from Mr. Ryan, I ask that you accept this cover letter as an attempt to comply with the Court's order dated March 18, 2009, in regard to extension requests.

In the attached motion for an extension of time, Appellate Defender, Carmen V. Ganjehsani, seeks a 30 day extension of time to file the initial brief of appellant and designation of matter. Based on that and his extremely heavy case load, as outlined in the motion, she was unable to complete the initial brief of appellant and designation of matter

Thank you for allowing me to bring this to your attention. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Lisa Campbell
Assistant Director
South Carolina Commission on
Indigent Defense