

**RECEIVED**  
**Mar 04 2024**  
**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Greenville County

Perry H. Gravely, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

RAYMOND MARTINEZ,

APPELLANT

APPELLATE CASE NO. 2023-001201

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

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Counsel for Raymond Martinez respectfully requests a **fourth and final thirty (30) day extension from March 4, 2024, until April 3, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. 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 Raymond Martinez 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 his caseload, counsel hopes that no further extension requests will be required.

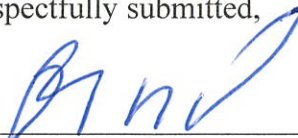
3. Counsel was a presenter at the S.C. Bar Criminal Practice CLE on February 23, 2024, in Columbia, South Carolina. Counsel is filing the Initial Brief of Appellant and Designation of Matter in the case of The State v. John A. Welch with this Court on March 6, 2024. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State v. Anthony Argoe with this Court on February 7, 2024. Counsel, along with co-counsels David Alexander and Lara M. Caudy, filed the Reply to the Brief in Opposition in the case of The State of South Carolina v. Timothy Ray Jones with the United States Supreme Court on February 2, 2024. Counsel filed the Initial Brief of Appellant in the case of The State v. Tirik Johnson-Epps with this Court on January 9, 2024. Counsel filed the Brief of Appellant in the case of The State v. Martel Gaddis with this Court on December 12, 2023. **Counsel also has extensive administrative duties as the Chief Appellate Defender.**

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. On February 28, 2024, 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, 2024.

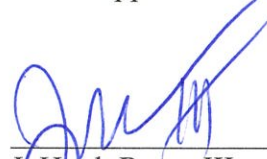
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension from March 4, 2024, until April 3, 2024**, in which to serve and file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

Respectfully submitted,



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Robert M. Dudek  
Chief Appellate Defender



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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 4th day of March, 2024.

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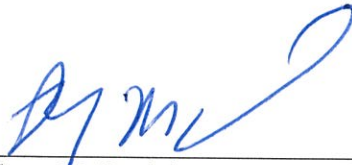
RAYMOND MARTINEZ,

APPELLANT

APPELLATE CASE NO. 2023-001201  
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CERTIFICATE OF SERVICE  
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Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Motion for Extension in the above-referenced case has been served upon Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 4th day of March, 2024.



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Robert M. Dudek  
Chief Appellate Defender

ATTORNEY FOR APPELLANT