

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Kristi Lea Harrington Circuit Court Judge

RECEIVED
AUG 16 2013

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

MARVIN BOWENS GREEN (2),

APPELLANT

Appellate Case No. 2012-212739

**PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER**

The undersigned counsel would respectfully request a thirty-day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today having been extended by three prior orders of this Court.
2. Counsel is preparing for the reconstruction hearing in the case of State v. Hascale Simmons in Beaufort County on August 20, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Wayne Stewart Curry in the this Court on August 15, 2013. Counsel testified before the Commission on Lawyer Conduct in the Calhoun building on August 14, 2013. Counsel filed the record on appeal

in the case of State v. Kelvin Michael Bowen in this Court on August 14, 2013. Counsel filed the petition for writ of certiorari in the case of State v. Anthony Hackshaw (Cert in the COA) in the Supreme Court on August 9, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Ralph B. Hayes in this Court on August 8, 2013. Counsel filed the record on appeal in the case of State v. Julia Gorman with this Court on August 6, 2013. Counsel filed the record on appeal in the case of State v. David Gerrard Johnson with this Court on August 2, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Ryan Carl Newman with this Court on July 30, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert Lee Nelson in this Court on July 29, 2013. Counsel filed the petition for writ of certiorari in the case of State v. Connie Dumas (Cert in the COA) with the Supreme Court on July 25, 2013. Counsel filed the initial reply brief of appellant in the case of State v. Alex Hunsberger with this Court on July 25, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. John Bonner with this Court on July 22, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Marty Baggett in this Court on July 18, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew Fullbright with this Court on July 16, 2013. Counsel filed the record on appeal in the case of State v. Malik Matthews in this Court on July 11, 2013. Counsel filed the petition for rehearing in the case of State v. Bobby Alexander Gilbert in this Court on July 11, 2013. Counsel filed the petition for writ of certiorari, the Johnson petition for writ of certiorari pursuant to Austin v. State and accompanying appendix in the case of Michael Miller v. State with the Supreme Court on July 11, 2013. Counsel

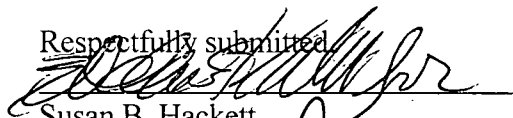
filed the petition for writ of certiorari and accompanying appendix in the case of Anthony Sanders v. The State of South Carolina with the Supreme Court on July 5, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Santiago Rios v. State with the Supreme Court on June 28, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Brown v. State with the Supreme Court on June 24, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Curtis Eugene Land with this Court on June 19, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jerod Swinton in this Court on June 18, 2013.

3. This request is made in good faith, and not for purposes of delay.

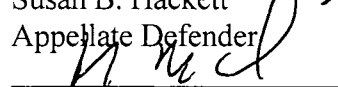
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the initial brief of appellant and designation of matter in this case. Counsel 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.

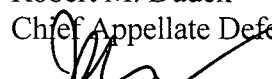
Respectfully submitted,



Susan B. Hackett
Appellate Defender



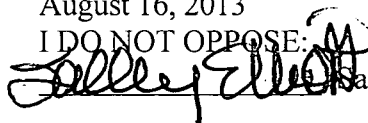
Robert M. Dudek
Chief Appellate Defender



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

August 16, 2013

I DO NOT OPPOSE:



Salley W. Elliott