

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Orangeburg County
Carmen T. Mullen, Circuit Court Judge

RECEIVED
SEP 05 2013
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JEFFREY E. MORTON,

APPELLANT

APPELLATE CASE NO. 2012-212989

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

The undersigned counsel respectfully requests an extension consistent with the rules for **Pool Cases** 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 extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed September 11, 2013. I have discussed this case with the Chief Attorney and this will be a Rule 608 and CLE credit **Pool Case**. **I understand that this extension request for the New Pool Attorney will be until December 2, 2013.**

1. The Court has granted counsel four previous extensions.

2. Counsel for Jeffrey Morton 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 Peter J. Grant v. State of South Carolina with the Supreme Court on September 3, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Clyde L. McBride v. State of South Carolina with the Supreme Court on August 28, 2013. Counsel filed the return to motion to dismiss in the case of The State v. Randy Jarrod Crosby with this Court on August 26, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Darrell Birch with this Court on August 23, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Charles Hammons with this Court on August 23, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Larry T. Perry with this Court on August 23, 2013. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of The State v. Jo Pradubsri with the Supreme Court on August 21, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon L. Ray v. State of South Carolina, with the Supreme Court on August 14, 2013. Counsel filed the brief of petitioner in the case of Ricky Dale Gilstrap v. State of South Carolina, with the Supreme Court on August 5, 2013. Counsel filed the initial reply brief of appellant and designation of matter in the case of The State v. Donald Marquice Anderson with this Court, on July 30, 2013. Counsel filed the initial reply brief of appellant and designation of matter in the case of The State v. Marcus Daniel Allison with this Court on July 30, 2013. 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.

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 extension until December 2, 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,

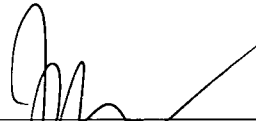


Carmen V. Ganjehsani
Appellate Defender

Attorney for Appellant



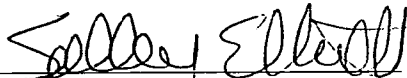
Robert M. Dudek
Chief Appellate Defender



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

This 5th day of September, 2013.

I consent:



Salley W. Elliott Esquire