

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Berkeley County

R. Markley Dennis Jr. Circuit Court Judge

RECEIVED

SEP 06 2013

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

FRED WOODROW CRIBB,

APPELLANT

Appellate Case No. 2012-213533

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

The undersigned counsel respectfully requests 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 extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.

2. Counsel filed the initial reply brief in the case of The State v. Eric E. Hewins with this Court on September 5, 2013. Counsel filed the initial reply brief of appellant in the case of The State v. Taurus Lamare Thompson with this Court on September 3, 2013. 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 this Court 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 this Court 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

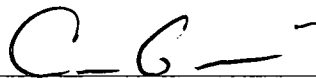
petition for writ of certiorari and accompanying appendix in the case of Randy Jennings v. State of South Carolina with the Supreme Court on July 5, 2013.

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

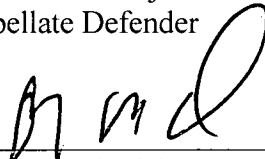
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. 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,



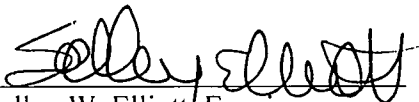
Carmen V. Ganjehsani
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

September 6th, 2013

I DO NOT OPPOSE:



Salley W. Elliott, Esquire