

RECEIVED

Feb 10 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of General Sessions

Robert E. Hood, Circuit Court Judge

Appellate Case No. 2024-001951
Case Nos. 2018-GS-28-01499

The State,

Respondent,

v.

Stacey McClintock Catoe,

Appellant.

MOTION FOR EXTENSION TO FILE
INITIAL BRIEF AND DESIGNATION OF APPELLANT

Comes now, Jack B. Swerling, attorney for the Appellant, Stacey McClintock Catoe, requesting an extension to file the Appellant's initial brief and designation of matter to be included in the Record on Appeal. Counsel previously requested a thirty-day extension of the deadline for these documents, and the Court granted the extension to February 10, 2025. Counsel respectfully requests an additional extension of thirty days to file these documents, to March 12, 2025.

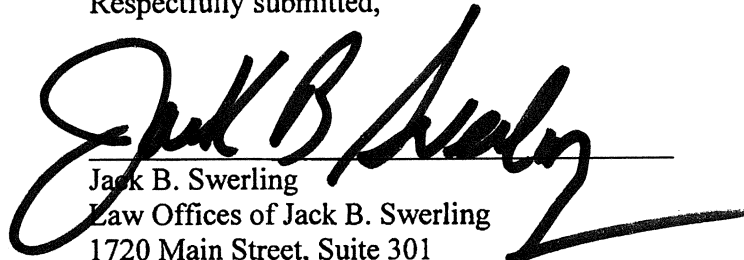
Counsel seeks this second extension due to counsel's recent unusually heavy schedule of trials, preparation for future trials, and work on appellate matters, and due to issues of staff turnover in his office. At present, counsel has no associate lawyer, no paralegal, and no secretarial staff

member. The recent staffing difficulties have caused a significant impairment in counsel's ability to complete his review of the lengthy trial transcript, research and analysis of the potential legal issues for appeal, and preparation of the initial brief of Appellant.

Good cause exists for the grant of a second extension, and the requirement of the Court's order of March 18, 2009, regarding extensions in criminal direct appeals is met. This extension request is made in good faith and not for the purpose of delay, but for good cause due to counsel's current workload and office staffing issues.

WHEREFORE, for good cause shown, counsel respectfully requests a thirty-day extension of time to serve and file the Appellant's initial brief and designation of matter, to March 12, 2025.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read "Jack B. Swerling". The signature is written over a horizontal line.

Jack B. Swerling
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Columbia, South Carolina 29201
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South Carolina Bar No. 5457
Attorney for Appellant

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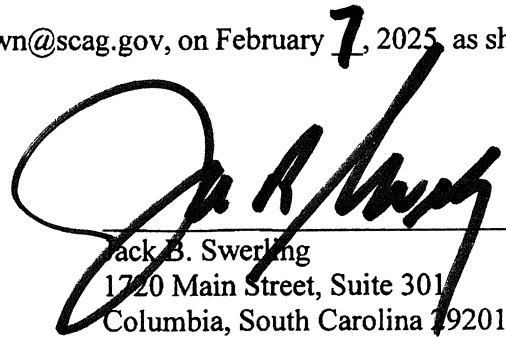
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PROOF OF SERVICE

I hereby certify that I am serving the Motion for Extension to File Initial Brief and Designation of Appellant, by email to Assistant Deputy Attorney General Melody Jane Brown, at her AIS email address, mbrown@scag.gov, on February 7, 2025, as shown by the email by which the Motion is being filed.



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