

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
OCT 04 2013
SC Court of Appeals

Appeal from Spartanburg County
Roger L. Couch, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

LAURI DANIELLE HOLLIS,

APPELLANT

Appellate Case No. 2012-213139

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

The undersigned counsel respectfully requests a **final thirty day extension, until November 4, 2013**, 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** as explained further, and in particular in paragraph three, below::

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.
2. Counsel is working on and plans to file the petition for writ of certiorari and accompanying appendix in the case of death penalty case of Marion Bowman v. State, a **death penalty** case in the Supreme Court **with a 10,000 page appendix** with co-counsel David

Alexander and Michael Anzelmo on October 18, 2013. Counsel is filing a petition for writ of certiorari in the case of Lewis Addis, Jr. v. State in the Supreme Court today, October 4, 2013. Counsel yesterday, October 3, 2013 filed a brief with this Court in the case of State v. Isaiah Brown. Counsel yesterday, October 3, 2013, also filed a reply brief, along with co-counsel Charles Grose, in the Supreme Court in the lifetime satellite monitoring case of State v. Anthony Nation. Counsel, Wednesday, October 2, 2013 had an oral argument in the case of State v. George L. Chavis in the Supreme Court. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of George Porterfield v. State in the Supreme Court on September 27, 2013. Counsel also presented at the Public Defender Convention that was held from September 23-25, 201. Counsel filed the petitions for writ of certiorari and accompanying appendices in the cases of State v. Jeffrey Michaelson (in the COA) and Rayshawn Pearson v. State in the Supreme Court on September 18, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Wright in this Court, as well as the petition for rehearing in the case of State v. James Bethel in the Supreme Court on September 13, 2013. Counsel filed the petitions for rehearing in the cases of State v. Anthony Wade and State v. Alton Shelley in the Supreme Court on September 12, 2013. Additionally, Counsel filed the petition for writ of certiorari and accompanying appendix in the **death penalty** case of State v. Brad Keith Sigmon in the United States Supreme Court on September 12, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. John L. Hogan in this Court on September 4, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Victor Weldon in this Court on August 28, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Charles M. Harris in this Court on August 14, 2013. Counsel filed both the initial brief of appellant and designation of matter, and the initial brief of respondent and designation of matter, in the cross-appeal case of

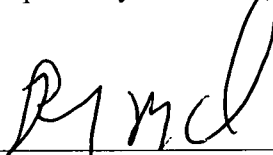
State v. Anthony Blakney in this Court on August 7, 2013. Counsel filed the initial brief of appellant (three issue merits brief) and designation of matter in the case of State v. Jason Bauman in this Court on August 2, 2013. Counsel filed a petition for writ of habeas corpus in the Supreme Court's original jurisdiction and accompanying appendix with Co-Counsel David Alexander and Susan Hackett in the case of State v. Curtis Simms in the Supreme Court on August 1, 2013.

3. Counsel also has extensive administrative duties as the Chief Appellate Defender, including death penalty cases. Counsel is making every effort to work on the older cases first to become more current on his caseload in the next two months after falling behind because of two major unavoidable surgeries. Counsel recognizes this Court's interest in moving its caseload and does not make this request for purposes of delay.

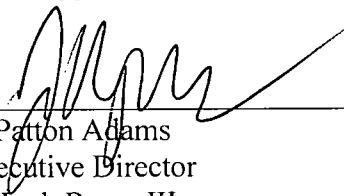
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request **final thirty day extension, until November 4, 2013**. 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



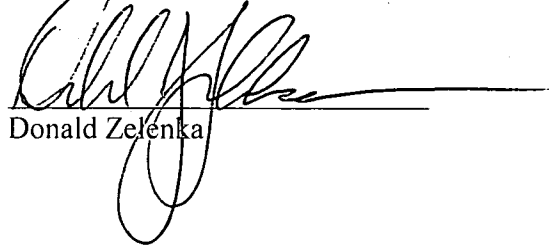
Robert M. Dudek
Chief Appellate Defender



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

October 4, 2013

I DO NOT OPPOSE:

A handwritten signature in black ink, appearing to read "Donald Zelenka", is written over a horizontal line. The signature is stylized and cursive.

Donald Zelenka