

Original

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Dorchester County  
Edgar W. Dickson, Circuit Court Judge  
\_\_\_\_\_

RECEIVED  
OCT 18 2013  
SC COURT OF APPEALS

THE STATE,

RESPONDENT,

v.

MELVIN HAYNES,

APPELLANT

Appellate Case No. 2013-000438  
\_\_\_\_\_

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 is filing today the initial brief of appellant and designation of matter in the case of The State v. Elizabeth M. Dinkins with this Court. Counsel filed the petition for writ of certiorari pursuant to Austin v. State in the case of Randy Elders v. State of South Carolina with the Supreme Court on October 16, 2013. Counsel filed the petition for writ of certiorari pursuant to Austin v. State in the case of Heyward Davis v. State of South Carolina with the Supreme Court on October 14, 2013. Counsel filed the petition for writ of certiorari and

accompanying appendix in the case of Heyward Davis v. State of South Carolina with the Supreme Court on October 14, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Conrad Slocumb with this Court on October 11, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Robert Livingston with this Court on October 11, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Elenie Isham Parker v. State of South Carolina with the Supreme Court on October 9, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daniel F. Miles with this Court on October 3, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Clarence Puckett, II with this Court on September 23, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Linwood Carson v. State of South Carolina with the Supreme Court on September 18, 2013. Counsel had an oral argument in the case of The State v. Kristopher Wilmont Berry in this Court on September 12, 2013. Counsel had an oral argument in the case of The State v. Karl Ryan Lane in this Court on September 11, 2013. 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 the Court of Appeals 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.

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

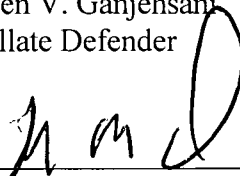
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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,



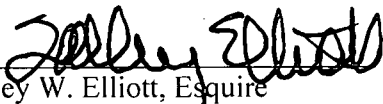
Carmen V. Ganjehsani  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

October 18<sup>th</sup>, 2013

I DO NOT OPPOSE:



Salley W. Elliott, Esquire