

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of General Sessions

Lee S. Alford, Circuit Court Judge

Case Nos. 2012-CP-42-2624, 2012-CP-42-2625, 2012-CP-42-2626, 2012-CP-42-2627,
2012-CP-42-2633, and 2012-CP-42-2634

The State of South Carolina,

Respondent,

v.

Ronasha Taylor,

Appellant.

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SC Court of Appeals

APPELLANT'S PETITION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

This Court's order appointing Andrew de Holl as counsel for Appellant Ronasha Taylor provides that the Initial Brief of Appellant and Designation of Matter to be Included in the Record on appeal are due Monday, December 2, 2013. Counsel for Appellant respectfully submits that extraordinary circumstances exist compelling an extension of this deadline.

1. This is a complex case involving six charges and six complaining witnesses, a lengthy trial transcript, and hours of videotape. For each charge and complaining witness, there are numerous issues for counsel to analyze, consider presenting to the Court, and discuss in his brief. The amount of work required to

adequately prepare the appeal exceeds that of a typical criminal appeal. Counsel has spent in excess of fifty hours working on this appeal and still needs a substantial amount of time to draft and revise the initial brief.

2. Counsel began working at his current law firm approximately three months ago. Counsel's firm requires him to participate in a new associate program that involves significant time commitments, including a mandatory three-day mandatory conference last month, during which time he had no meaningful opportunities to work on this appeal.

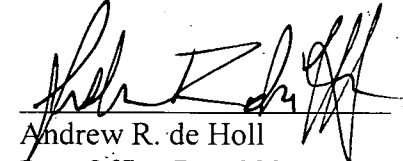
3. Counsel has been summoned for jury duty on November 21, 2013. Even if counsel is not selected for jury service, attending court for the selection process will interfere with his ability to work on this appeal.

4. Last, but not least, on November 6, 2013, at 10:06 p.m., counsel's wife gave birth to our first child, Mary Sims de Holl. The labor and delivery process lasted approximately twenty-six hours, during which time counsel did not leave his wife's side. He remained with his wife and daughter in the hospital until the afternoon of November 9, while his wife recovered and his daughter received antibiotics intravenously to treat fever and infection. Although mother and baby are now home and in good health, the addition of this new life to our family has imposed additional demands upon counsel's time, attention, and energy, the likes of which he has never before encountered.

Counsel submits that the above circumstances are extraordinary and warrant an extension of time so that he can adequately prepare the appeal. Counsel therefore respectfully requests that this Court grant a thirty-one day extension of the current filing

deadline. Counsel has spoken with Assistant Deputy Attorney General Salley W. Elliott about this request. She does not oppose the Court granting an extension. If the Court grants the request, the new deadline will be Thursday, January 2, 2014.

Respectfully submitted,



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Attorneys for Appellant

Charleston, South Carolina
November 13, 2013

Cc:
Robert M. Dudek
Salley W. Elliott

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CERTIFICATE OF SERVICE

I certify that Appellant's Petition for Extension of Time to File Initial Brief and Designation of Matter to Be Included in Record on Appeal was served upon Assistant Deputy Attorney General Salley W. Elliott on November 13, 2013, by mailing a copy of the Petition to the following address:

Office of the South Carolina Attorney General
ATTN: Salley W. Elliott
Rembert Dennis Building
1000 Assembly Street
Columbia, SC 29201


Andrew R. de Holl

Cc:
Robert M. Dudek

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SC Court of Appeals



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November 13, 2013

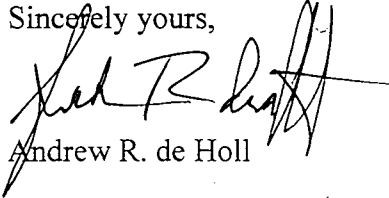
The Honorable Jenny Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: The State v. Ronasha Taylor
Appellate Case No. 2012-213228
WCSR File No. 71803.0002.8

Dear Ms. Kitchings:

I am enclosing the original and six copies of a petition for an extension of time to file the Initial Brief of Appellant and Designation of Matter. Please let me know if the Court requires anything further to consider my petition. Thank you for your assistance and for the Court's consideration in this matter.

Sincerely yours,



Andrew R. de Holl

/ard

Cc:
Robert M. Dudek
Salley W. Elliott

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