

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Certiorari to Sparatnaburg County  
J. Derham Cole, Circuit Court Judge  
\_\_\_\_\_

ORIGINAL  
RECEIVED

MAR 12 2014

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

TAMAR BRYANT,

APPELLANT

APPELLATE CASE NO 2013-00671  
\_\_\_\_\_

MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER  
\_\_\_\_\_

The undersigned counsel would respectfully request a **final seven-day (7) extension until March 19, 2014**, in which to file the initial brief of appellant and designation of matter in the above-referenced case. **Counsel has discussed the number of extensions in this case with Chief Appellate Defender, Robert Dudek. Counsel expects to file this brief on March 19, 2014.** This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009.

In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. **Counsel had requested a prior extension that he intended to be the last; however, counsel is unable to comply with that order due to his current caseload and other**

**exceptional circumstances**, counsel would respectfully show the Court the following exigent circumstances. Counsel is currently working on a petition for writ of certiorari and accompanying appendix in the case of William L. Childers v. State, in which the appendix is over 1,000 pages and which is due on its final extension March 12, 2014.

2. Counsel for Tamar Bryant respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. On Wednesday, March 12, 2014 counsel will file petition for writ of certiorari and accompanying appendix in the case of William L. Childers v. State in the Supreme Court. On Wednesday, March 5, 2014, counsel had an oral argument in the Supreme Court in the case of State v. Curtis J. Simms. Also on Wednesday, March 5, 2014, counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Gunnells v. State in the Supreme Court. On Thursday, March 6, 2014, counsel had an oral argument in the Court of Appeals in the case of State v. Jason A. Johnson. On Wednesday, February 26, 2014, counsel filed the brief of appellant and record on appeal in State v. Curtis Fields in the Court of Appeals. On Friday, February 21, 2014, counsel filed the reply to the return to the petition for writ of certiorari in this Court in Mark Anthony Martucci v. State. On Tuesday, February 18, 2014, counsel filed the initial brief of appellant and designation of matter in the case of State v. Lou Ann Robinson in this Court. On Tuesday, February 4, 2014, counsel had an oral argument in this Court in the case of State v. Julian Deandre Battle. Counsel filed the brief of respondent in the case of State v. William Coaxum Sr. in the Supreme Court on Monday, January 27, 2014. On Tuesday, January 21, 2014, counsel filed the return to the petition for writ of certiorari in the case of Jwan T. Smith v. State in the Supreme Court. On Thursday, January 16, 2014, counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Latron Bryant in the Supreme Court. On Wednesday, January 15, 2014, counsel filed the petition for writ of certiorari to the

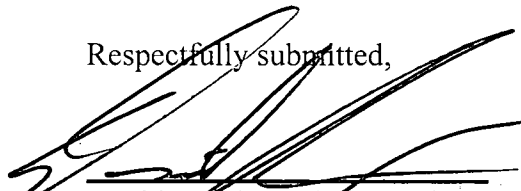
South Carolina Supreme Court and accompanying appendix in the case of Richard A. Sims v. State in the United States Supreme Court.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

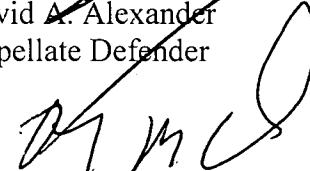
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final seven-day (7) extension until March 19, 2014**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.


Respectfully submitted,



David A. Alexander  
Appellate Defender



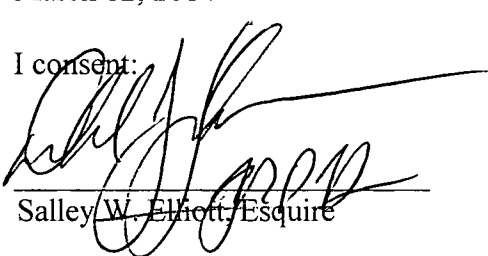
Robert M. Dudek  
Chief Appellate Defender



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

March 12, 2014

I consent:



Salley W. Elliott, Esquire