

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Certiorari to Charleston County  
J. C. Buddy Nicholson, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

RESPONDENT,

V.

ERICK ARROYO,

APPELLANT

APPELLATE CASE NO. 2013-000694

RECEIVED  
MAR 17 2014  
SC Court of Appeals

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

Counsel for Erick Arroyo respectfully requests a **final thirty (30) day extension, until April 16, 2014**, in which to file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fifth request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. The Court has granted counsel four previous extensions.
2. Counsel for Erick Arroyo 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 her caseload, counsel hopes that no further extension requests will be required.
3. Counsel filed reply brief of appellant in the case of State v. Brenda Bratschi in this Court, yesterday, March 14, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William L. Childers v. State in the Supreme Court on Wednesday, March 12, 2014. Counsel

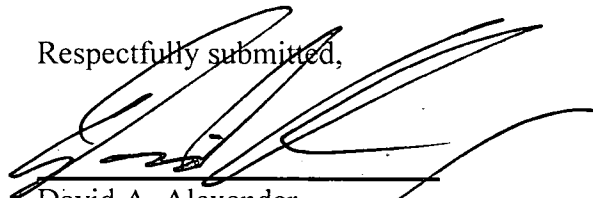
had an oral argument in the Supreme Court in the case of State v. Curtis J. Simms with co-counsel Robert M. Dudek on Wednesday, March 5, 2014, and counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Gunnells v. State in the Supreme Court. On Thursday, March 6, 2014, counsel had an oral argument in this Court 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 this Court. 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.

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.

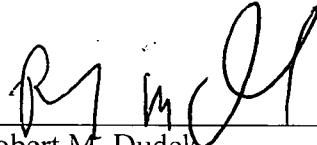
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until April 16, 2014**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

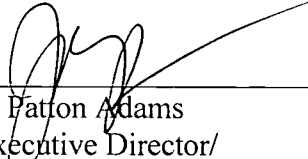
A handwritten signature in black ink, appearing to read 'David A. Alexander', written over a horizontal line.

David A. Alexander  
Appellate Defender

Attorney for Appellant



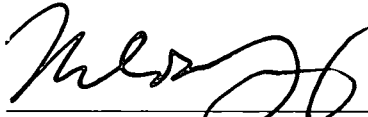
Robert M. Dudek  
Chief Appellate Defender



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

This 17th day of March, 2014.

I consent:



*re* Salley W. Elliott, Esquire