ORIGINAL

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

RECEIVED
MAR 28 2014
SC Court of Appeals

Appeal from Pickens County

Letitia H. Verdin, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

CHRISTINA REECE,

APPELLANT

APPELLATE CASE NO. 2013-000656

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 filed the initial brief of appellant in the case of State v. In The Interest of Johnny A., a Juvenile Under the Age of Seventeen in this Court and intends to file Wednesday, March 26, 2014. Counsel presented at the Best Practices Seminar in Charleston, S.C. on Monday, March 24, 2014. Counsel had oral arguments in the cases of State v. Curtis Simms in the Supreme Court with co-counsel David Alexander and State v. Mark Peters in this Court on

March 5, 2014. Counsel had an oral argument in the case of State v. Jefferson Perry in this Court on March 4, 2014. Counsel filed the brief of appellant in the case of State v. Jeremy Fleming on February 27, 2014 in this Court. Counsel filed the brief of petitioner in the case of State v. Darian Robinson in the Supreme Court on February 25, 2014. Counsel filed the brief of appellant in the case of State v. Fred Cole Jr. in this Court on February 21, 2014. Counsel filed a petition for rehearing in the case of State v. Patrick Guess in this Court on February 20, 2014. Counsel had an oral argument in the case of John Edward Weik v. State, a death penalty case in the Supreme Court on February 19, 2014. Counsel filed the initial brief of appellant in the case of State v. Keith Letmon on February 6, 2014 in this Court. Counsel assisted in the preparation for and attended the oral argument in the case State v. Anthony Nation in the Supreme Court on February 5, 2014. The case was argued by co-counsel Charles Grose. Counsel filed the brief of appellant in the case of State v. William Pou in this Court on January 27, 2014. Counsel filed the brief of appellant in the case of State v. William Pearson in this Court on January 24, 2014. Counsel filed the reply brief of appellant in the case of State v. Curtis Simms with co-counsel David Alexander in the Supreme Court on January 17, 2014. Counsel filed the return to petition for writ of certiorari in the case of In the Interest of Brandon M., A Juvenile Under the Age of Seventeen on January 14, 2014 in the Supreme Court. Counsel filed a reply brief of respondent in the case of John Edward Weik v. State, a death penalty case in the Supreme Court on January 10, 2014. Counsel had an oral argument in the case of State v. Michael Rogers in this Court on January 7, 2014. **Counsel also has extensive administrative duties as the Chief Appellate Defender.**

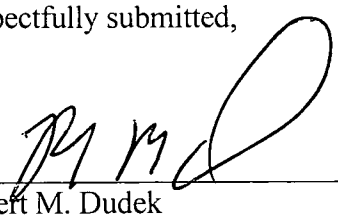
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will

hopefully become more manageable in the near future, and less extensions will need to be requested.

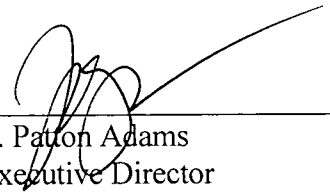
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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,



Robert M. Dudek
Chief Appellate Defender



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

March 28, 2014

I DO NOT OPPOSE:

Salley W. Elliott