

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Spartanburg County
Roger L. Couch, Circuit Court Judge

RECEIVED

APR 04 2014

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

CHRISTOPHER LEE EMMONS,

APPELLANT

APPELLATE CASE NO. 2013-002018

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

Counsel for Christopher Emmons respectfully requests an extension of thirty (30) days 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 fourth 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 three previous extensions.
2. Counsel for Christopher Emmons 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 is filing today the initial brief of appellant and designation of matter in the case of The State v. Michael Ramey with this Court. Counsel filed the petition for writ of certiorari in the case of Billy S. Tucker v. State of South Carolina with this Court on March 28, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Lambert v. State of South Carolina with the Supreme Court on March 24, 2014. Counsel filed the brief of petitioner win the case of The State v. Rushan Counts with the Supreme Court on March 20, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darrell N. Mitchell v. State of South Carolina with the Supreme Court on March 20, 2014. Counsel had an oral argument in the case of The State v. Eric Hewins in the Supreme Court on March 18, 2014. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Karl Ryan Lane with the Supreme Court on March 13, 2014. Counsel filed the petition for writ of certiorari pursuant to Austin v. State in the case of Travis McKie v. State of South Carolina with the Supreme Court on March 7, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis McKie v. State of South Carolina with the Supreme Court on March 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dan Temple with the this Court on March 5, 2014. Counsel filed the petition for writ of certiorari in the case of Steven Michael LeCroy v. State of South Carolina with the Supreme Court on February 27, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Hubert Brown with this Court on February 26, 2014. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Linwood Carson v. State of South Carolina with the Supreme Court on February 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Abraham Kelty v. State of South Carolina with the Supreme Court on February 2, 2014. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of The State v. Ashley Eugene Moore with the Supreme Court on January 27, 2014.


Counsel filed the initial reply brief in the case of The State v. James Harris with this Court on January 23, 2014. Counsel filed the initial reply brief in the case of The State v. Elizabeth M. Dinkins with this Court on January 23, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Kemon P., a Minor Under the Age of Seventeen with the Supreme Court on January 22, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Darrell Birch with this Court on January 21, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derrick Tyrone Blake v. State of South Carolina with the Supreme Court on January 17, 2014. Counsel filed a petition for writ of certiorari in the case of The State v. Anthony T. Williamson with the United States Supreme Court on January 16, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jimmy Charles Kendall, III v. State of South Carolina with the Supreme Court on January 15, 2104. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roger Dale Burke v. The State with the Supreme Court on January 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Richard J. Coleman v. The State with the Supreme Court on January 9, 2014. Counsel had an oral argument in the case of The State v. Christopher Lee Johnson in this Court on January 7, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Anthony Allen v. State of South Carolina with the Supreme Court on January 2, 2014.

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.

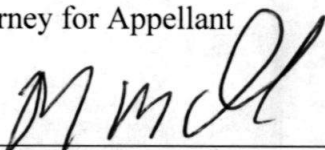
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request an additional thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.


Respectfully submitted,



Carmen V. Ganjehsani
Appellate Defender

Attorney for Appellant


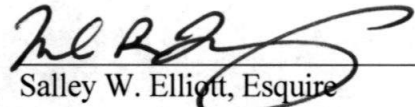
Robert M. Dudek
Chief Appellate Defender



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

This 4th day of April, 2014.

I consent:



P02 Salley W. Elliott, Esquire