

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Pickens County

Letitia H. Verdin, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

MAY 28 2014

SC Court of Appeals

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 **final twenty-three day extension, until June 20, 2014**, in which to file the initial brief of appellant and designation of matter in the above-referenced case. **Counsel will make every effort to file the brief in advance of that deadline.** 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. However, upon reading the transcript to prepare the brief an unusual issue regarding jurisdiction and the suppression hearing forced counsel to look into matters outside of the trial transcripts.

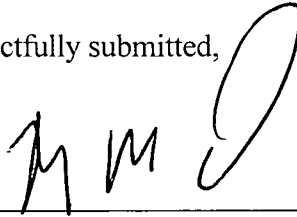
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. McIver Feagin with this Court on Friday, May 23, 2014. Counsel went to death row at Lieber Correctional Institution on Thursday, May 22, 2014 to meet with Sammie Stokes to discuss and prepare for the upcoming reconstruction hearing. Counsel filed the petition for rehearing in the case of State v. Mark Peters with this Court on Thursday, May 22, 2014. Counsel filed the brief of respondent in the case of Michael Hough v. State with this Court on May 21, 2014. Counsel filed the brief of petitioner in the case of State v. Derrick McDonald with the Supreme Court on May 13, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Samuel B., a Juvenile Under the Age of Seventeen with this Court on May 7, 2014. Counsel had an oral argument in the case of State v. Victor White in this Court on May 6, 2014. Counsel filed the reply to return to petition for writ of certiorari in the case of State v. Marion Bowman, a death penalty case with the Supreme Court on May 5, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Daniel Willis with this Court on May 5, 2014. Counsel is working on the potential reconstruction hearing in the case of State v. Sammie Stokes, a death penalty case. Counsel filed the petition for rehearing in the case of State v. Charles Harris with this Court on April 17, 2014. Counsel had oral arguments in the cases of State v. Richey Boyd and State v. Tawanda Allen in this Court on April 10, 2014. Counsel filed the brief of respondent in the case of State v. Richard Bill Niles Jr. with the Supreme Court on April 9, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jonathan Mallory with this Court on April 4, 2014. Counsel filed the petition for rehearing in the case of State v. Jamaal Hinson with this Court with co-counsel Reid Sherard on Thursday, April 3, 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.

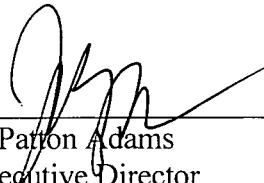
WHEREFORE, the undersigned counsel would respectfully request a **final twenty-three day extension, until June 20, 2014**, in which to file the initial brief of appellant and designation of matter in the above-referenced case. **Counsel will make every effort to file the brief in advance of that deadline.** 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,



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Robert M. Dudek  
Chief Appellate Defender

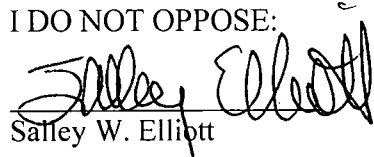


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T. Patton Adams  
Executive Director  
J. Hugh Ryan, III  
General Counsel

May 28, 2014

I DO NOT OPPOSE:



Salley W. Elliott