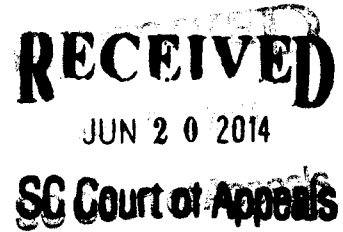


STATE OF SOUTH CAROLINA

IN THE 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 **final thirteen day extension, until July 3, 2014**, 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. Counsel had intended to file the brief in this case today. However, under the new Supreme Court rule not **allowing any extensions upon a grant of certiorari counsel has had to work on the brief of petitioner due Monday, May 23, 2014 in State v. Christopher Heller**. Counsel regrets the necessity of this final thirteen day extension particularly given this Court's emphasis on moving appeals expeditiously.

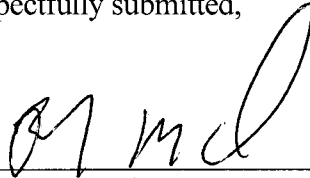
2. Counsel is writing the brief of petitioner in the case of State v. Christopher Heller due Monday, May 23, 2014. Counsel also has an oral argument in the case of State v. Richard Niles Jr. in the Supreme Court on Wednesday, June 25, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Joseph Walker with this Court on Friday, June 13, 2014. Counsel had an oral argument in the case of State v. Darian Robinson in the Supreme Court on June 12, 2014. Counsel filed the petition for rehearing in the case of State v. Bayan Aleskey, a death penalty case with the Supreme Court, on June 6, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Anthony C. Johnson with this Court on June 4, 2014. 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 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 thirteen day extension, until July 3, 2014**, in which to file the initial brief of appellant and designation of matter in the above-referenced case. 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

June 20, 2014

I DO NOT OPPOSE:



Salley W. Elliott