

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Horry County

Roger L. Couch, Circuit Court Judge

FILED

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SC SUPREME COURT

THE STATE,

RESPONDENT,

V.

KENNETH JORDAN BELL,

APPELLANT

APPELLATE CASE NO. 2013-001841

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

Counsel for Kenneth Jordan Bell 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 Kenneth Jordan Bell 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 the petition for rehearing in the case of The State v. Taurus Lamare Thompson with this Court on July 3, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Steven Morgan with this Court on June 30, 2014. Counsel filed the petition for rehearing in the case of The State v. James C. Tyner with this Court on June 26, 2014. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Jimmy Charles Kendall, III v. State of South Carolina with the Supreme Court on June 18, 2104. Counsel filed the petition for rehearing in the case of The State v. Forrest Kelly Samples with this Court on June 17, 2104. Counsel had an oral argument in the case of The State v. Donald M. Anderson in this Court on June 17, 2014. Counsel filed the brief of petitioner in the case of George Wigington v. State of South Carolina with this Court on June 11, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gregory Mark Crolley v. State of South Carolina with the Supreme Court on June 5, 2014. Counsel had an oral argument in the case of The State v. Gregory Ivery in this Court on June 5, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Emmons with this Court on June 4, 2014. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Derrick Tyrone Blake v. State of South Carolina with the Supreme Court on June 2, 2014. Counsel filed the petition for rehearing in the case of The State v. Christopher Lee Johnson with this Court on May 28, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Marcus Townsend v. State of South Carolina with the Supreme Court on May 23, 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.

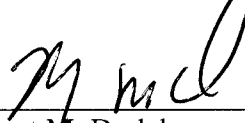
WHEREFORE, the undersigned counsel would respectfully request an additional thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

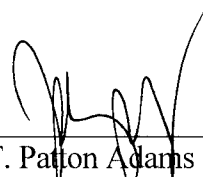


Carmen V. Ganjehsani
Appellate Defender

Attorney for Appellant



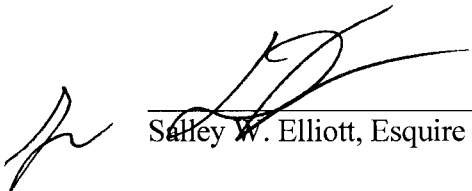
Robert M. Dudek
Chief Appellate Defender



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

This 7th day of July, 2014.

I consent:



Salley W. Elliott, Esquire