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SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenville County

C. Victor Pyle, Jr., Circuit Court Judge

THE STATE,

RESPONDENT,

V.

MARTHA ELIZABETH HALE,

APPELLANT

APPELLATE CASE NO. 2012-213693

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

Counsel for Martha Elizabeth Hales respectfully requests an extension of thirty (30) days, **until August 27, 2014**, 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 third 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.
2. Counsel for Martha Elizabeth Hale respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of In The Matter of the Care and Treatment of Patrick Guess with the Supreme Court on

July 23, 2014. Additionally, counsel filed the petition for rehearing with co-counsels Charles Grose, Jr. and Shane E. Goranson in the case of State v. Anthony Nation with the Supreme Court on July 17, 2014. Counsel also filed the petition for writ of certiorari and accompanying appendix in the case of Daryl L. Gray v. State with the Supreme Court on July 14, 2014. Counsel also filed the initial brief of appellant and designation of matter in the case of State v. Harold Cartwright with this Court on July 11, 2014. Counsel also filed a motion to vacate convictions, remand for a new trial and to dismiss the appeal in the case of State v. Christina Reece, with this Court on July 3, 2014 Counsel also had an oral argument in the case of State v. Richard Niles Jr. in the Supreme Court on June 25, 2014. Counsel also filed the brief of petitioner in the case of State v. Christopher Heller in the Supreme Court on June 23, 2014. Counsel also filed the initial brief of appellant and designation of matter in the case of State v. Joseph Walker with this Court on June 13, 2014. Counsel also had an oral argument in the case of State v. Darian Robinson in the Supreme Court on June 12, 2014. Counsel also 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 also 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 also filed the initial brief of appellant and designation of matter in the case of State v. McIver Feagin with this Court on May 23, 2014.

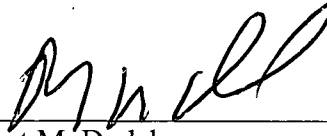
4. Counsel makes this request in good faith and not for purpose of delay. Counsel is working first on cases that have been extended three times in an effort to make his caseload more manageable and reduce the number of extension in the future.

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

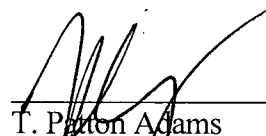
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, **until August 27, 2014**, in which to file the initial brief of appellant and designation of

matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



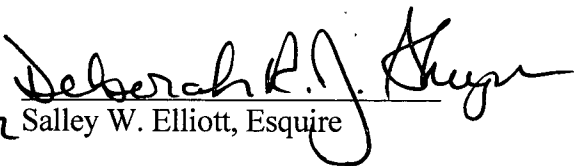
Robert M. Dudek
Chief Appellate Defender



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

This 28th day of July, 2014.

I consent:


for Salley W. Elliott, Esquire