

 ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

AUG 07 2014

SC Court of Appeals

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Certiorari to Horry County

Roger L. Couch, Circuit Court Judge  
\_\_\_\_\_

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 Bell respectfully requests a **final five (5) day extension, until August 11, 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 fifth 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 four previous extensions.
2. Counsel for Kenneth 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 plans to file the initial reply brief of appellant in the case of State v. Dan Lavert Temple in this Court today, August 7, 2014. Counsel also plans to file the petition for writ of certiorari and accompanying appendix in the case of Anthony Wilson v. State in the Supreme Court today, August 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jovan Mitchell in this Court on August 1, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joshua Paris v. State in the Supreme Court on Monday, July 28, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Robert Byrd v. State in the Supreme Court on July 23, 2014. Counsel filed the brief of petitioner in the case of State v. Norman Hayes in this Court on July 18, 2014. Counsel filed the petition for rehearing in the case of The State v. Gregory Ivery with this Court on July 15, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey Evans v. State with the Supreme Court on July 14, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Roderick Sellers with this Court on July 11, 2014. 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 in 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.

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.

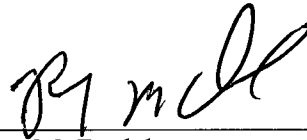
WHEREFORE, the undersigned counsel would respectfully request a **final five (5) day extension until August 11, 2014**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

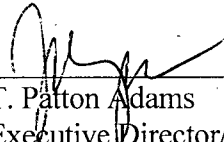


Carmen V. Ganjehsani  
Appellate Defender

Attorney for Appellant




Robert M. Dudek  
Chief Appellate Defender



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

This 7<sup>th</sup> day of August, 2014.

I consent:

  
Salley W. Elliott, Esquire