

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Aiken County  
Doyet A. Early, III, Circuit Court Judge  
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**RECEIVED**

AUG 18 2014

**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

WILLIAM POU,

APPELLANT

APPELLATE CASE NO. 2012-213617

\_\_\_\_\_  
MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE INITIAL REPLY BRIEF OF APPELLANT  
\_\_\_\_\_

Counsel for William Pou respectfully requests a final two (2) day extension, **until August 20, 2014**, in which to file the Initial Reply Brief of Appellant in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. In support of this request, counsel shows:

1. The initial reply brief of appellant is due to be filed with the Court today.
2. Counsel for William Pou respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.
3. Counsel is preparing for his power-point presentation for the summary judge's conference Tuesday, August 19, 2014. Counsel is also working on and planning to file petitions for

rehearing in the cases of State v. Victor A. White and State v. Jefferson Perry with this Court on Thursday, August 21, 2014.

4. Counsel had to prepare for the reconstruction hearing in the case of State v. Travoris Hurst held in Charleston, South Carolina on August 14, 2014. Counsel also filed the petition for rehearing in State v. Tawanda Allen with this Court on August 13, 2014. Counsel also filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Charles M. Harris with the Supreme Court on August 8, 2014. Counsel also filed the initial brief of appellant and designation of matter in the case of The State v. Nathaniel Witherspoon with this Court on August 6, 2014. Counsel also filed the petition for writ of certiorari and accompanying appendix with co-counsel, Reid T. Sherard in the case of The State of South Carolina v. Jamaal Hinson with the Supreme Court on July 29, 2014. Counsel also filed the petition to exceed twenty-five page limit for a petition for writ of certiorari in the case of The State of South Carolina v. Jamaal Hinson with the Supreme Court on July 29, 2014. Counsel also filed the return to petition for writ of certiorari in the case of James E. Waiters v. State of South Carolina with the Supreme Court on July 28, 2014. Counsel also 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. Counsel also 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

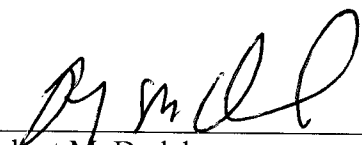
of State v. Christina Reece, with this Court on July 3, 2014. Counsel also had an oral argument in the case of State v. Richard Niles Jr. in the Supreme Court on June 25, 2014. Counsel also filed the brief of petitioner in the case of State v. Christopher Heller in the Supreme Court on June 23, 2014. 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.

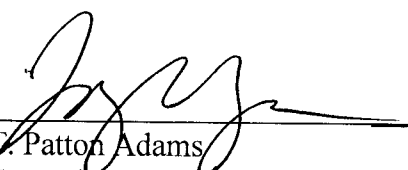
5. Counsel makes this request in good faith and not for purpose of delay. Counsel is working on first on cases that have been extended three times in an effort to make his caseload more manageable and reduce the number of extensions in the future.

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

WHEREFORE, the undersigned counsel would respectfully request a final two (2) day extension, **until August 20, 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.

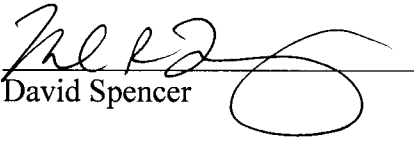
Respectfully submitted,

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

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

This 18<sup>th</sup> day of July, 2014.

I consent:

  
For David Spencer