

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Darlington County

Howard P. King, Circuit Court Judge

ORIGINAL

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SEP 19 2014

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JOSHUA A. REED,

APPELLANT

APPELLATE CASE NO. 2013-002318

PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER

The undersigned counsel respectfully requests a thirty day extension 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.

2. Counsel is filing today the brief of appellant in the case of State v. Jabriel L. Singleton with this Court. Counsel had an oral argument in the case of State v. Antonio Glover in this Court on September 11, 2014. Counsel had an oral argument in the case of State v. Anthony Jackson in this Court on September 10, 2014. Counsel had an oral argument in the case of State v. Christopher Paul Mahaffey in this Court on September 9, 2014. Counsel filed the brief of

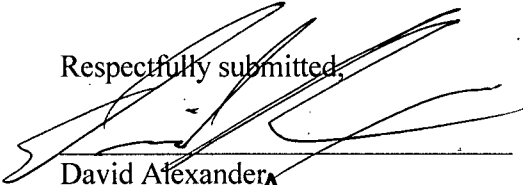
petitioner in the case of State v. Darren G. Scott with the Supreme Court on September 4, 2014. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of State v. Julian De'Andre Battle with the Supreme Court on September 3, 2014. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of State v. Kevin Tyrone Bennett with the Supreme Court on August 28, 2014. Counsel filed the record on appeal in the case of Michael D. Hall v. State of South Carolina which was granted, and expedited in the original jurisdiction of the Supreme Court, with the Supreme Court on August 27, 2014, as co-counsel. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gerald Barrett with this Court on August 27, 2014. Counsel filed the designation of matter in the case of Michael D. Hall v. State of South Carolina with the Supreme Court on August 22, 2014, as co-counsel. Counsel filed the initial brief of appellant and designation of matter in the case of State v. William Donald Bolt with this Court on August 20, 2014. Counsel filed the brief of appellant and designation of matter in the case of State v. Talmadge Rowell with this Court on August 8, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Edwards Haynes with this Court on July 29, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Randall S. Tyler v. State of South Carolina with the Supreme Court on July 28, 2014. Counsel filed the brief of appellant and designation of matter in the case of State v. Benjamin William Rhodes with this Court on July 17, 2014.

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 the consent below, counsel for the state graciously consents to or does not oppose this request.

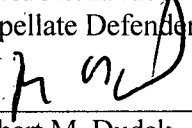
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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David Alexander  
Appellate Defender

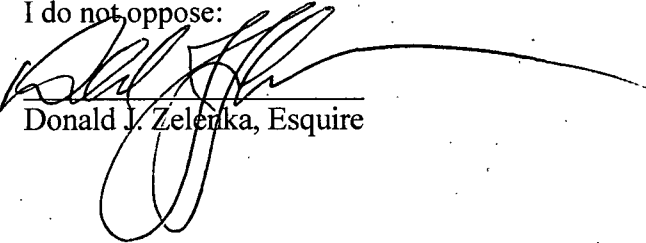


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Robert M. Dudek  
Chief Appellate Defender

September 19<sup>th</sup>, 2014

I do not oppose:



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Donald J. Zelenka, Esquire