

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Spartanburg County  
Roger L. Couch, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

OCT 13 2014

**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

ISSAC LYLES,

APPELLANT

APPELLATE CASE NO. 2013-002639

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

Counsel for Issac Lyles respectfully requests a **final 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 Issac Lyles 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 State v. Elizabeth Dinkins with this Court on October 9, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Rodney Young v. State with the Supreme Court on October 8, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Darnell Russell v. State with the Supreme Court on October 8, 2014. Counsel had an oral argument in the case of State v. Marcus Allison in this Court on October 6, 2014. Counsel filed the initial brief and designation of matter in the case of State v. Toshonda Mickens with this Court on October 2, 2014. Counsel filed the initial brief and designation of matter in the case of State v. Andre Decosta with this Court on September 26, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Taurus Thompson v. State with the Supreme Court on September 18, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Donald Anderson v. State with the Supreme Court on September 18, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Gregory Ivery v. State with the Supreme Court on September 18, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Randall Sanders v. State with the Supreme Court on September 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alexander Samuel v. State with the Supreme Court on September 10, 2014. Counsel had an oral argument in the case of State v. James Harris in this Court on Tuesday, September 9, 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.

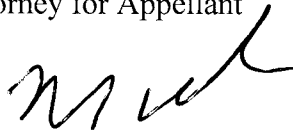
WHEREFORE, the undersigned counsel would respectfully request a **final** thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

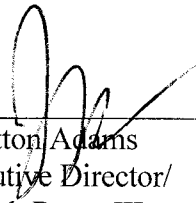


Carmen V. Ganjehsani  
Appellate Defender

Attorney for Appellant



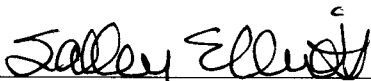
Robert M. Dudek  
Chief Appellate Defender



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

This 13th day of October, 2014.

I consent:



Salley W. Elliott, Esquire