

11-11-14

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Greenville County  
H. Dean Hall, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**  
DEC 19 2014  
**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

ROBERT W. WOODS,

APPELLANT

APPELLATE CASE NO. 2013-000814

\_\_\_\_\_  
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 **based upon medical problems beyond counsel's control**. 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. **On November 20, 2014, counsel had in-patient oral surgery and had complications which have caused him to miss significant time at work. That surgical site has now become infected, which is extremely painful and counsel is unable to complete this brief by the deadline.** Counsel filed the brief of petitioner in the case of State v. Manuel

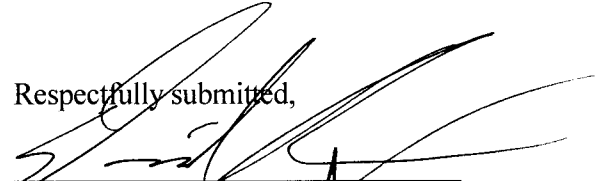
Antonio Marin with the Supreme Court on December 11, 2014. Counsel had an oral argument in the case of Michael D. Hall v. State of South Carolina in the Supreme Court on December 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Thomas Earnest Webb v. State of South Carolina with the Supreme Court on November 19, 2014. Counsel filed the brief of appellant in the case of State v. Joshua A. Reed with this on November 13, 2014. Counsel filed the brief of appellant in the case of State v. Shawn William Sharpe with this Court on November 12, 2014. On November 7, 2014, counsel spoke at a Seminar for South Carolina Magistrate Judges. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jamar Lavert Belk v. State of South Carolina with the Supreme Court on November 4, 2014. Counsel was a speaker during the group sessions for the Appellate Practice Project on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kelvin Jackson with this Court on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher W. Berke with this Court on October 29, 2014. Counsel filed the brief of appellant in the case of State v. Jessie Davis with this Court on October 27, 2014. Counsel filed the initial reply brief in the case of State v. Lamar Sequan Brown with this Court on October 27, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Zachary Fowler v. State of South Carolina with the Supreme Court on October 22, 2014. Counsel filed the petition for rehearing in the case of State v. Anthony Jackson with this Court on October 14, 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.

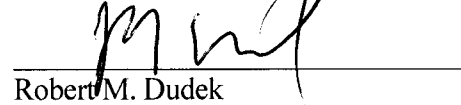
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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David Alexander  
Appellate Defender

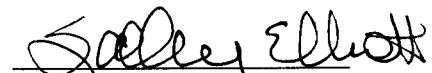


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Robert M. Dudek  
Chief Appellate Defender

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

I do not oppose:



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Salley W. Elliott, Esquire