

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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JAN 02 2015

SC Court of Appeals

Appeal from Charleston County

Stephanie P. McDonald, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

LANELL GOODWINE,

APPELLANT

APPELLATE CASE NO. 2013-001948

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. In addition, pursuant to the Supreme Court's Order dated December 30, 2014, counsel along with Chief Appellate Defender Robert M. Dudek, is working on and will be filing the initial brief of appellant and designation of matter in the death penalty case of State v. Ricky Lee Blackwell with the Supreme Court that unexpectedly became due on January 8, 2015. Therefore, all of counsel's time until January 8, 2015 will be devoted

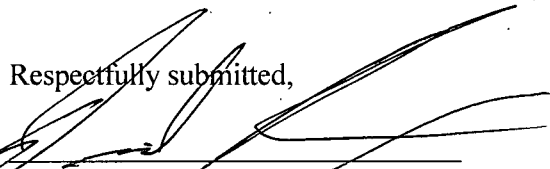
solely to that case. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Sheldon Lamar Kelly with this Court on December 29, 2014. Counsel filed the brief of petitioner in the case of State v. Manuel Antonio Marin with the Supreme Court on December 11, 2014. 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 Court 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. Counsel filed the initial reply brief in the case of State v. Erick Arroyo with this Court on October 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sterling Devonte Brown v. State of South Carolina with the Supreme Court on October 9, 2014. Counsel filed the petition for writ

of certiorari and accompanying appendix in the case of Markelle Jamar Reid v. State of South Carolina 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 State v. Steven Kranendonk with the Supreme Court on October 6, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Jason Alan Johnson with the Supreme Court on October 3, 2014.

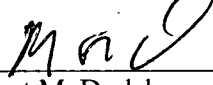
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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,


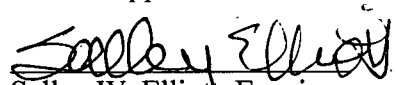
David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

January 2nd, 2015

I do not oppose:



Salley W. Elliott, Esquire