

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Colleton County
Perry M. Buckner, Circuit Court Judge

RECEIVED
DEC 31 2014
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

MACK WASHINGTON,

APPELLANT

APPELLATE CASE NO. 2014-000667

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

Counsel respectfully requests a **final extension of thirty (30) days until January 30, 2015**, 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 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.

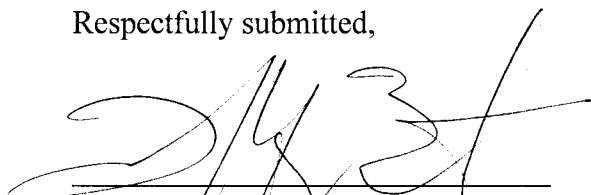
3. **Counsel started working with the South Carolina Commission on Indigent Defense Division of Appellate Defense on September 25, 2014.** Counsel will file the petition for writ of certiorari and accompanying appendix in the case of Todd F. Smith v. State in the Supreme Court today. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alphonso Simmons v. State in the Supreme Court on December 12, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jaleel Page v. State in the Supreme Court on December 8, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Tonya Mcalhaney in the Court of Appeals on December 5, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Randy Howze in the Court of Appeals on November 25, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Pernell Byas in the Court of Appeals on November 14, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of George T. Middleton v. State with the Supreme Court on October 15, 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.

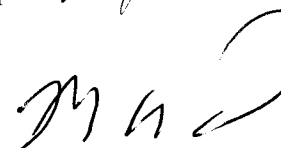
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until January 30, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

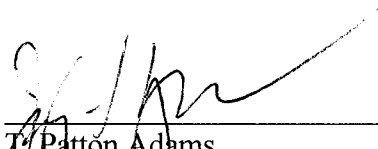
Respectfully submitted,



Tiffany L. Butler
Appellate Defender



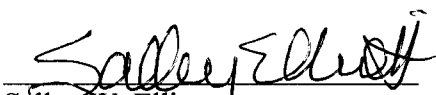
Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
General Counsel

This 31st day of December, 2014

I DO NOT oppose:



Salley W. Elliott