

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Bamberg County

Doyet A. Early III, Circuit Court Judge

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JAN 07 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JACQUELINE BACON,

APPELLANT

Appellate Case No. 2014-001751

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 new to Appellate Defense, starting on December 17, 2014. Counsel is working on and plans to file the brief of respondent in the case of State v. Alex Robinson, and the petition for writ of certiorari and accompanying appendix in the case of Jerene Hayward v. State, with the Supreme Court, today January 7, 2015. Counsel had an oral argument in the case of State v. Conrad Slocum, yesterday, January 6, 2015 in this Court. Counsel had an oral argument in the case of State v. Rajerick Knight on Monday, January 5, 2015 in the this Court.

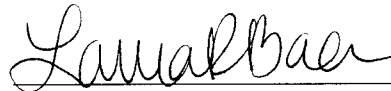
Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny Crockett v. State with this Court on December 19, 2014.

3. This request is made in good faith, and not for purposes of delay.

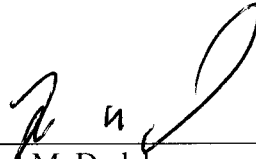
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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,



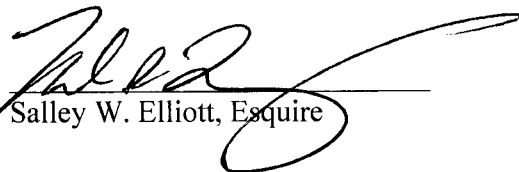
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Laura R. Baer  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

January 7, 2015

I DO NOT OPPOSE:



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Salley W. Elliott, Esquire

RW