

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Marion County

D. Craig Brown, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

RICHARD ALLEN WOODBURY,

APPELLANT

APPELLATE CASE NO. 2014-000390

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

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Counsel respectfully requests a **final extension of thirty (30) days until Thursday, February 19, 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.

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SC Court of Appeals

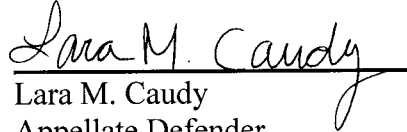
3. On January 14, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Eugene Rhinehart v. State with the Supreme Court. On January 9, 2015, counsel filed a brief of petitioner in Yesenia Ramirez v. State with the Supreme Court. On January 9, 2015, counsel filed a brief of petitioner in Barry Allen Evans v. State with the Supreme Court. On January 6, 2015, counsel held an oral argument in State v. Denorris Hall with this Court. On January 5, 2015, counsel held an oral argument in State v. Phillip Monroe before this Court. On December 22, 2014, counsel filed petition for writ of certiorari and accompanying appendix in Rodney A. Simmons v. State with the Supreme Court. On December 18 2014, counsel filed an initial brief of appellant and designation of matter in State v. Sammie L. Gerrick with this Court. On December 17, 2014, counsel filed a Motion to Remand to Reconstruct Court's Exhibit in State v. Barry Eugene Lafavor with this Court. On December 9, 2014, counsel held an oral argument in State v. Tiphani Marie Parkhurst with this Court. On December 8, 2014, counsel held an oral argument in Michael A. Hough v. State with this Court. On December 3, 2014, counsel filed an initial brief of appellant and designation of matter in State v. Ryan P. Deleston with this Court. On November 20, counsel filed a petition for writ of certiorari and accompanying appendix in Phillip Jackson v. State with the Supreme Court. On November 12, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Raymond Bradley McCarter v. State with the Supreme Court.

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.

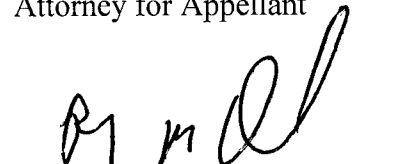
5. Counsel for the Attorney General's office consents to this request shown by signature below.

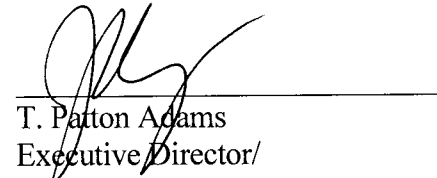
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until Thursday, February 19, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

  
Lara M. Caudy  
Appellate Defender


Attorney for Appellant

  
Robert M. Dudek  
Chief Appellate Defender

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

This 20<sup>th</sup> day of January, 2015

I consent:

  
Salley W. Elliott