

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Pickens County

G. Edward Welmaker, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

JAN 28 2015

**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

JOSEPH A. DRACHSLIN, SR.,

APPELLANT

APPELLATE CASE NO. 2014-000945  
\_\_\_\_\_

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

Counsel for Joseph Drachslin, Sr. respectfully requests a **fourth and final** extension of thirty (30) days 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 for Joseph Drachslin, Sr. 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 his caseload, counsel hopes that no further extension requests will be required.

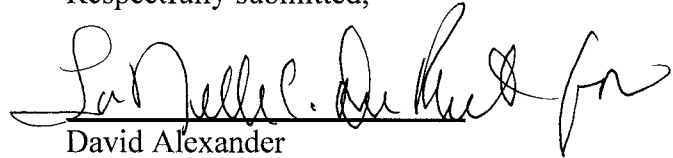
3. Counsel is filing today the brief of appellant in the case of State v. Carlos Roberto Lopez with this Court. Counsel filed the brief of appellant in the case of State v. John Bryan Martin with this Court on January 23, 2015. Counsel filed the brief of petitioner in the case of Darrell L. Goss v. State of South Carolina with this Court on January 20, 2015. Counsel filed the brief of petitioner in the case of State v. Jason Alan Johnson with the Supreme Court on January 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Meadows with this Court on January 16, 2015. Counsel filed the brief of appellant in the case of State v. Gonzales Wardlaw with this Court on January 16, 2015. Counsel filed the brief of appellant in the case of State v. Prince Snipes with this Court on January 14, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Anthony Jackson with this Court on January 12, 2015. Counsel filed the brief of respondent in the case of State v. Kevin Tyrone Bennett with this Court on January 12, 2015. On January 8, 2015, together with co-counsel Robert M. Dudek, counsel filed the initial brief of appellant in the capital case of State v. Ricky Blackwell in this Court. 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.

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.

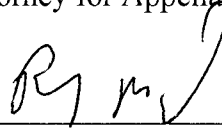
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

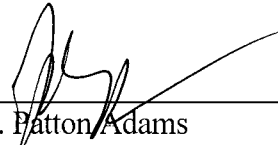


David Alexander  
Appellate Defender

Attorney for Appellant



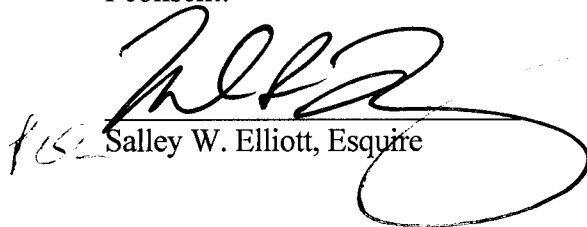
Robert M. Dudek  
Chief Appellate Defender



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

This 28<sup>th</sup> day of January, 2015.

I consent:



Salley W. Elliott, Esquire