

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

1/20/15  
**RECEIVED**  
FEB 19 2015  
**SC Court of Appeals**

\_\_\_\_\_  
Appeal from Charleston County  
Kristi Lea Harrington, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

RESPONDENT,

V.

ROBERT LEE WRIGHT,

APPELLANT

APPELLATE CASE NO. 2014-001023  
\_\_\_\_\_

**PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT AND  
DESIGNATION OF MATTER**  
\_\_\_\_\_

The undersigned counsel would respectfully request a **final 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 exigent circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today having been extended by three prior orders of this Court.
2. Counsel filed the petition for rehearing in the case of State v. Darryl L. Drayton in this Court on February 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Keith Robinson v. State in the

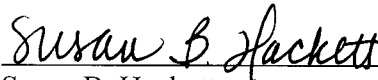
Supreme Court on February 12, 2015. Counsel argued in the case of State v. Kenneth Lynch in this Court on February 3, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Malcolm Brabham in the Court of Appeals on February 3, 2015. On January 27, 2015, Counsel attended a hearing as a witness before the Commission on Lawyer Conduct pursuant to a subpoena. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jonathan Campbell v. State in the Supreme Court on January 21, 2015. Counsel filed the reply to the return to petition for writ of certiorari in the case of Albert S. Kelly v. State in the Supreme Court on January 20, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Ralph B. Hayes in the Supreme Court on January 16, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Mathew Fullbright in the Supreme Court on January 16, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Alexander L. Hunsberger in the Supreme Court on January 16, 2015. Counsel filed the reply to the state's return to motion to remand for competency determination in the case of Drew John Monahan v. State in this Court on January 14, 2015. Counsel argued in the case of State v. Marvin Bowens Green in this Court on January 8, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Richard Deas v. State in the Supreme Court on January 5, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Thaddeus Curry v. State with the Supreme Court on December 29, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Steven Otts in this Court on December 22, 2014.

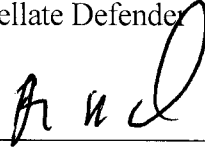
3. This request is made in good faith, and not for purposes of delay.

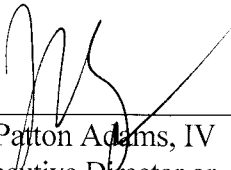
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension** in which to file the initial brief of appellant and designation of matter in this case. Counsel 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,

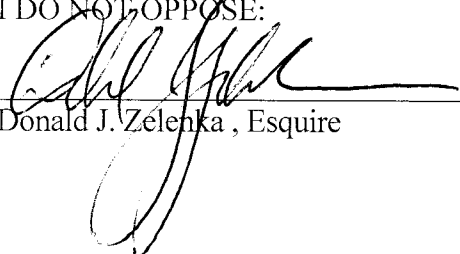
  
\_\_\_\_\_  
Susan B. Hackett  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

  
\_\_\_\_\_  
T. Patton Adams, IV  
Executive Director or  
J. Hugh Ryan, III  
General Counsel

February 19, 2015

I DO NOT OPPOSE:

  
\_\_\_\_\_  
Donald J. Zelenka, Esquire



# SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense  
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Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

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FEB 19 2015  
SC Court of Appeals

February 18, 2015

Ms. Dixie C. Eubank  
Circuit Court Reporter  
P O Box 2194  
Murrells Inlet, SC 29576-2194

Dear Ms. Eubank:

Please provide us with the following transcript:

The State v. Derek V. Collier, Appellate Case No. Case #: 14-GS-26-01540-01541.  
2015-000184

County: Horry Date of Trial: December 10, 2014 (Trial)

Presiding Judge: Steven H. John

Pursuant to the SC Court Reporter's Manual, please number the lines on the paper from 1-25, and include any and all recorded motions, pre and post-trial. Consecutive numbering of pages must be used throughout all volumes regardless of the number of volumes involved. Additionally, please transcribe the **jury selection**, and the State and defense counsel's **opening and closing arguments**, and include the **jury strike sheet**. Please be sure to include **Headers** and a **complete index** including a **listing of exhibits**.

If you are aware of any co-defendants or if the Attorney General's Office has already requested a transcript, please let us know.

To ensure prompt payment, please sign and complete the enclosed CID FORM 3500 and include the original criminal case number (Indictment number) where the space is provided.

Sincerely,

*[Handwritten Signature]*  
French

Director

cc: S.C. Court of Appeals  
Attorney General's Office

*[Handwritten Initials]*