


STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Dorchester County
Maite Murphy, Circuit Court Judge

 ORIGINAL
RECEIVED
FEB 27 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JONATHAN BROWN,

APPELLANT

APPELLATE CASE NO. 2 014-001554

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

Counsel respectfully requests an 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 third 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 two 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.

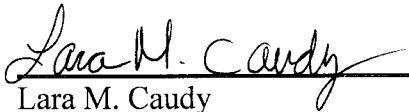
3. Today, counsel will file a petition for writ of certiorari to the Court of Appeals in State v. Brad Alan Day with the Supreme Court. On February 25, 2015, counsel filed a petition for rehearing in State v. Michael A. Hough with this Court. On February 23, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Luther Garner v. State with the Supreme Court. On February 17, 2015, counsel filed an initial brief of appellant and designation of matter in State v. Richard A. Woodbury with this Court. On February 6, 2015, counsel filed a brief of respondent in Frankie Lee Bryant v. State with this Court. On February 2, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Terrance Terry v. State with the Supreme Court. On January 27, 2015, counsel filed a petition for rehearing in State v. Brad Alan Day with this Court. On January 26, 2015, counsel travelled to Beaufort County to attend a hearing in State v. Terrance Seabrook. On January 22, 2015, counsel filed a petition for rehearing in State v. Damon T. Brown with this Court. On January 21, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Darrell Burgess v. State with the Supreme Court. 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.

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 an additional 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,



Lara M. Caudy

Appellate Defender

Attorney for Appellant

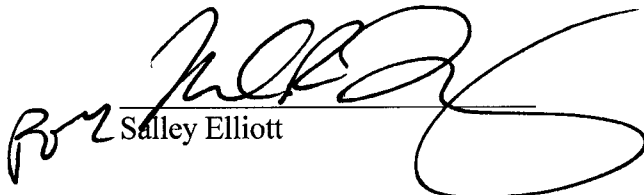


Robert M. Dudek

Chief Appellate Defender

This 27th day of February, 2015

I consent:



Salley Elliott