

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Lexington County

William P. Keesley, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

MAR 18 2015

**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

QUENTIN RAYMAR PRICE,

APPELLANT

APPELLATE CASE NO. 2014-002208  
\_\_\_\_\_

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 on March 23, 2015.

2. Counsel for Appellant underwent knee surgery on December 5, 2014 and has experienced significant complications since having the surgery. As a result of these complications, counsel has been placed on medical leave on a semi-bed rest status multiple times. Most recently, in a note from her doctor dated March 5, 2015, counsel was excused from work for another three weeks, beginning on March 5, 2015. As a result, counsel has limited

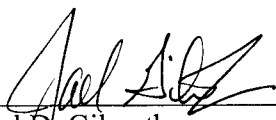
access to the resources necessary to complete and timely file the initial brief and designation of matter to be included on appeal.

3. Counsel for Appellant is a full time public defender in the Eleventh Judicial Circuit with a case load of approximately 110 general sessions cases and several magistrate cases pending in Lexington County.

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

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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Jael D. Gilreath  
Assistant Public Defender  
Eleventh Judicial Circuit  
407 West Main Street  
Lexington, SC 29072  
(803) 785-8873

March 18, 2015

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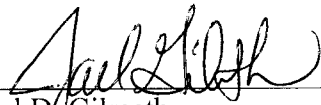
QUENTIN RAYMAR PRICE,

APPELLANT

APPELLATE CASE NO. 2014-002208


\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

The undersigned attorney hereby certifies that a true copy of the petition for extension to file the initial brief of appellant and designation of matter in the above referenced case has been served upon Salley W. Elliott, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, via U.S. Mail this 18th day of March, 2015.

  
\_\_\_\_\_  
Jael D. Gilreath  
Assistant Public Defender

ATTORNEY FOR APPELLANT

SUBSCRIBED AND SWORN TO before me  
this 18th day of March, 2015.

  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: 3-25-2017