

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Richland County
Robert E. Hood, Circuit Court Judge

RECEIVED
MAR 23 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JOHN SMITH ,

APPELLANT

APPELLATE CASE NO. 2014-001366

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

Counsel for John Smith respectfully requests a **final extension of five (5) days, until March 27, 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 for John Smith 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. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Bill Breland with this Court on March 6, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jacqueline Bacon with this Court on March 5, 2015. Counsel had an oral argument in the case of State v. Christopher Russell in this Court on March 2, 2015. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of State v. Daniel Jackson with the Supreme Court, on February 23, 2015. Counsel filed the initial reply brief of appellant in the case of State v. Andre Decosta with this Court on February 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Stephens v. State with the Supreme Court on February 11, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James McAbee with this Court on February 9, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Vladimir Pantovich v. State with the Supreme Court on February 6, 2015.

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.

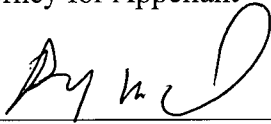
WHEREFORE, the undersigned counsel would respectfully request **final extension of five (5) days, until March 27, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

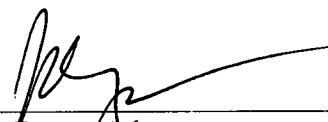


Laura R. Baer
Appellate Defender

Attorney for Appellant



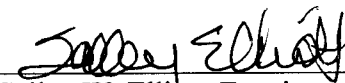
Robert M. Dudek
Chief Appellate Defender



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

This 23rd day of March, 2015.

I consent:


Salley W. Elliott, Esquire