

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Charleston County

Kristi Lea Harrington, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**  
MAR 23 2015  
**SC Court of Appeals**

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 twenty-day extension until April 13, 2015** 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 four prior orders of this Court.
2. In the past three weeks, counsel has filed three petitions for writ of certiorari in the United States Supreme Court, one of which involved the death penalty. Additionally, during the past three weeks, counsel filed a petition for rehearing in the South Carolina

Supreme Court in another death penalty case. **As this Court is aware, counsel does not request fifth extensions in cases very often. This is not the normal course, and will not become the normal course. However, the recent filing requirements in other cases, particularly the death penalty cases previously mentioned, have forced counsel to request this fifth extension.**

3. Counsel is filing the petition for writ of certiorari in the case of Richard Bernard Moore v. State in the United States Supreme Court today, March 23, 2015. Counsel filed the petition for rehearing in the case of Stephen Corey Bryant v. State in the Supreme Court on March 19, 2015. Counsel filed a petition for writ of certiorari in the case of James Prather v. State in the United States Supreme Court on March 18, 2015. Counsel filed the Brief of Petitioner in the case of State v. David Gerrard Johnson in the Supreme Court on March 12, 2015. Counsel filed a petition for writ of certiorari in the case of State v. Derringer Young in the United States Supreme Court on March 10, 2015. Counsel filed the Brief of Petitioner in the case of Drew John Monahan v. State in this Court on March 9, 2015. Counsel argued in the case of State v. Nathaniel B. Beeks in this Court on March 4, 2015. Counsel argued in the case of State v. Walter M. Bash in this Court on March 3, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Devin Johnson in this Court on February 26, 2015. Counsel filed the reply brief of petitioner in the case of Anthony Sanders v. State in the Supreme Court on February 23, 2015. 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 filed the Anders Brief of

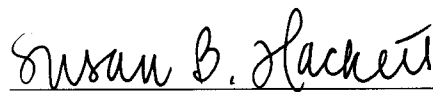
Appellant and Designation of matter along with the Record on Appeal in the case of State v. Malcolm Brabham in this Court on February 3, 2015. Counsel argued in the case of State v. Kenneth Lynch in this Court on February 3, 2015. On January 27, 2015, Counsel attended a hearing as a witness before the Commission on Lawyer Conduct pursuant to a subpoena.

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

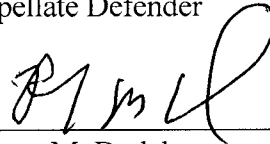
5. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final twenty-day extension until April 13, 2015** 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.

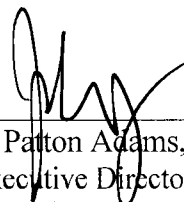
Respectfully submitted,



Susan B. Hackett  
Appellate Defender



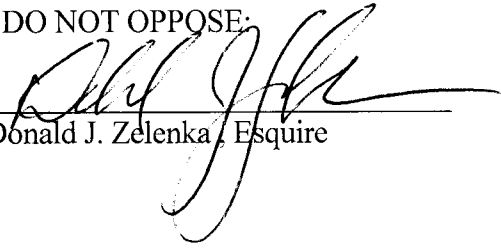
Robert M. Dudek  
Chief Appellate Defender



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

March 23, 2015

I DO NOT OPPOSE:

A handwritten signature in black ink, appearing to read 'Donald J. Zelenka', written over a horizontal line.

Donald J. Zelenka, Esquire