

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Dorchester County
Maite Murphy, Circuit Court Judge

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MAR 30 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 a **final extension of thirty (30) days until April 29, 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 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.

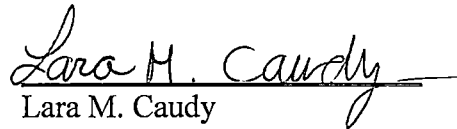
3. On March 27, 2015, counsel traveled to Beaufort County in preparation for the reconstruction hearing in State v. Terrance Seabrook. On March 26, 2015, counsel filed a brief of appellant and designation of matter in State v. Maurice Anthony Odom with this Court. On March 16, 2015, counsel filed a brief of appellant and designation of matter in State v. Ricky Dale Pace with this Court. On March 13, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Damon T. Brown with the Supreme Court. On March 12, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Daniel E. Dickson v. State with the Supreme Court. On March 3, 2015, counsel held an oral argument in State v. Daniel Lopez before this Court. On February 27, 2015, counsel filed 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.

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.

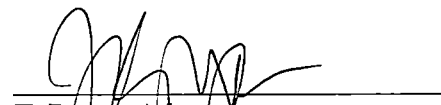
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until April 29, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,


Lara M. Caudy
Appellate Defender

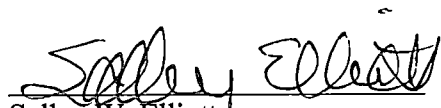
Attorney for Appellant


Robert M. Dudek
Chief Appellate Defender


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

This 30th day of March, 2015

I consent:


Salley W. Elliott