

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
APR 10 2015  
SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
William P. Keesley, Circuit Court Judge

Appellate Case No. 2014-002208

THE STATE OF SOUTH CAROLINA,

RESPONDENT

v.

QUENTIN RAYMAR PRICE,

APPELLANT

**PETITION FOR EXTENSION TO FILE RETURN TO RESPONDENT'S MOTION  
TO DISMISS APPEAL OR, ALTERNATIVELY, TO REMAND TO CIRCUIT  
COURT FOR RULING ON PENDING PETITION**

The undersigned counsel would respectfully request a ten day extension in which to file the Return to Respondent's motion, which was filed on April 3, 2015, in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. Respondent's Motion to Dismiss or, Alternatively to Remand was filed and sent to Appellant via email on April 3, 2015. Rule 240(e) of the South Carolina Appellate Court Rules permits the filing of a return within ten (10) days of the date of service of the motion. Under this rule, the return to Respondent's motion is due on or before April 13, 2015.

2. Counsel for Appellant returned to work the week of March 30, 2015 from being on medical leave for the previous three weeks and has been placed on medical

leave for several weeks at a time on multiple occasions over the past four months as a result of complications from a recent surgery.

3 Counsel for Appellant is a full time assistant public defender with a case load of around 115 pending General Sessions cases and several magistrate cases.


4. Respondent's motion was received via email on Friday, April 3, 2015. During the week of April 6, 2015, counsel for Appellant has had to prepare for and represent numerous clients in transfer court pleas, court appearances, and preliminary hearings. Additionally, the Lexington County Court of General Sessions will be in a term of court during the week of April 13, 2015, and counsel is preparing for numerous pleas that are scheduled during that week

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

4 Per an email dated April 9, 2015, counsel for Respondent graciously consents to this request.

WHEREFORE, the undersigned counsel would respectfully request a ten day extension in which to file the Return to Petitioner's Motion to Dismiss Appeal or, Alternatively, to Remand to Circuit Court for Ruling on Pending Petition. 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,

  
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Jael Gilreath  
Assistant Public Defender

April 10, 2015

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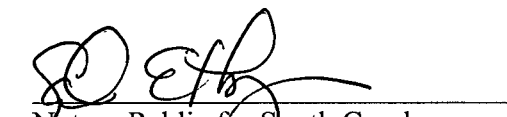
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file Appellant's Return to Respondent's Motion to Dismiss or, in the Alternative, to Remand 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 email and U.S Mail this 10th day of April, 2015

  
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Jael D. Gilreath  
Assistant Public Defender

ATTORNEY FOR APPELLANT

SUBSCRIBED AND SWORN TO before me  
this 10th day of April, 2015.

  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: 3.25.2024