

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Richland County
James R. Barber III, Circuit Court Judge

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APR 08 2015

SC Court of Appeals

RESPONDENT,

THE STATE,

V.

MICHAEL BROWN,

APPELLANT

Appellate Case No. 2014-001715

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 today.
2. Counsel filed the return to petition for writ of certiorari in Osiel Narciso v. State with the Supreme Court on April 6, 2015. Counsel filed the petition for rehearing in the case of State v. Conrad Slocumb with this Court on April 2, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ronald Mack v. State with the Supreme Court on April 1, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. John Smith with this Court on March 27, 2015. Counsel filed the reply to initial brief of respondent in the case of State v. Mandy Smith with this Court on March 26,

2015. 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.

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

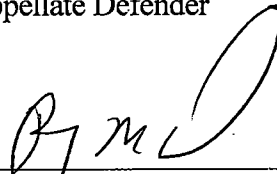
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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,



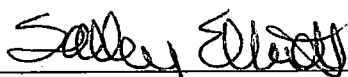
Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

April 8, 2015

I DO NOT OPPOSE:



Salley W. Elliott, Esquire