

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Anderson County

RECEIVED

G. Edward Welmaker, Circuit Court Judge

MAY 08 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

v.

JAMEL D. WATT,

APPELLANT.

APPELLATE CASE NO. 2014-001594

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

Counsel for James Clyde Dill, Jr. respectfully requests an extension of thirty (30) days, **until June 8, 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 third 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 two previous extensions.

2. Counsel for James Clyde Dill, Jr. 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 his caseload, counsel hopes that no further extension requests will be required.

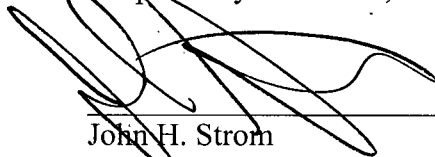
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kathryn King with the Court of Appeals on May 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gary Grant v. State of South Carolina in the Supreme Court on May 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny White v. State of South Carolina in the Supreme Court on April 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Reginald Murray v. State of South Carolina in the Supreme Court on April 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Deleorn Thompson v. State of South Carolina in the Supreme Court on April 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roger Rutledge v. State of South Carolina in the Supreme Court on April 3, 2015. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Phillip Fleming Watts v. State of South Carolina with the Supreme Court on April 3, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Arnold L. Ward v. State of South Carolina with the Supreme Court on April 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Upson with the Court of Appeals on March 23, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. O'Neal Bernard Byrdic, Jr. with the Court of Appeals on March 23, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Billy Joe Hannah v. State of South Carolina with the Supreme Court on March 19, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, **until June 8, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



John H. Strom
Appellate Defender

Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender

This 8th day of May, 2015.

I consent:


Salley W. Elliott, Esquire