

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Richland County

James R. Barber, III, Circuit Court Judge

ORIGINAL
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MAY 08 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

MICHAEL ORLANDO BROWN,

APPELLANT

APPELLATE CASE NO. 2014-001715

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

Counsel for Michael Orlando Brown respectfully requests a **final 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 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 for Michael Orlando Brown 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. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Evette Franklin v. State with the Supreme Court on May 6, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Darrell Birch with the Supreme Court on May 4, 2015. Counsel had an oral argument in the case of State v. Norman Hayes in the Court of Appeals on May 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Earl Malcom Burr v. State with the Supreme Court on April 28, 2015. Counsel had an oral argument in the case of Richard Beekman v. State in the Supreme Court on April 22, 2015. Counsel had an oral argument in the case of State v. Michael Ramey in this Court on April 21, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Owens v. State with the Supreme Court on April 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William C. Doar, III v. State with the Supreme Court on April 13, 2015. Counsel filed the return to petition for writ of certiorari in Osiel Narciso v. State with the Supreme Court on April 6, 2015.

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.

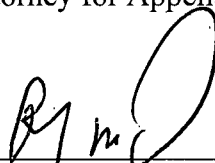
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until June 8, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

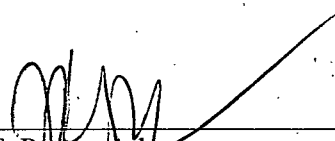


Laura R. Baer
Appellate Defender

Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender



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

This 8th day of May, 2014.

I consent:


Salley W. Elliott, Esquire