

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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 ORIGINAL

Appeal from Spartanburg County  
Salley W. Elliot, Circuit Court Judge

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**RECEIVED**  
MAY 06 2015  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

ANNIE JACKSON,

APPELLANT

APPELLATE CASE NO. 2014-002547

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

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Counsel respectfully requests an extension of thirty (30) days 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 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.

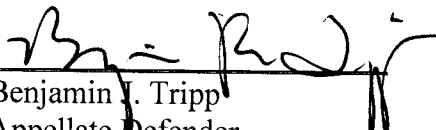
3. On April 28, 2015 counsel filed the initial brief of appellant and designation of matter in State v. Evandor Keath Thompson with the Court of Appeals. On April 28, 2015 counsel filed the initial brief of appellant and designation of matter in State v. Tevin Hart with the Court of Appeals. On April 13, 2015 counsel filed the initial brief of appellant and designation of matter in State v. Eddie Mack Stewart with the Court of Appeals. On April 7, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in John T. Robinson v. State with the Supreme Court. On March 31, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Curtis Schoclet v. State with the Supreme Court. On March 27, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Thomas A. Smart v. State with the Supreme Court. On March 23, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Jason Boney v. State with the Supreme Court. On March 20, 2015, counsel filed a petition for rehearing in State v. Jabbarie Brown with the Court of Appeals. On March 19, 2015, counsel filed a brief of appellant pursuant to *White v. State* in John G. Kimble v. State with the Supreme Court. On March 19, 2015, counsel filed a brief of appellant and designation of matter in State v. Michael D. Camp with the Court of Appeals. On March 11, 2015, counsel held an oral argument in State v. Michael C. Andes before the Court of Appeals.

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.

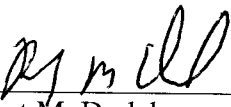
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request an additional thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

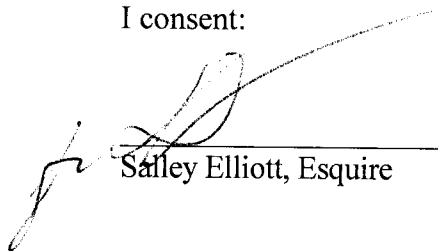
  
Benjamin J. Tripp  
Appellate Defender

Attorney for Appellant

  
Robert M. Dudek  
Chief Appellate Defender

This 6th day of May, 2015

I consent:

  
Sailey Elliott, Esquire