

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from York County
John C. Hayes, III, Circuit Court Judge

 ORIGINAL

RECEIVED

MAY 15 2015

RESPONDENT

SC Court of Appeals

STATE,

V.

TYRESS A. LITTLEJOHN,

APPELLANT

APPELLATE CASE NO. 2014-002247

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

Counsel for Tyress Littlejohn respectfully requests a **fourth and final** extension of thirty (30) **until June 15, 2015**, 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 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 Tyress Littlejohn 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 petition for writ of certiorari and accompanying appendix in the case of Miama Kromah v. State of South Carolina with the Supreme Court on May 7, 2015. Counsel had an oral argument in the case of State v. Lamar Sequan Brown with this Court on May 5, 2015. Counsel filed the brief of appellant in the case of State v. Leonard Eugene Brockington with this Court on May 4, 2015. Counsel had an oral argument in the case of State v. Darren Scott before the Supreme Court on April 22, 2015, as co-counsel with Robert M. Dudek. Counsel filed the brief of appellant in the case of State v. Justin R. Simms with this Court on April 21, 2015. Counsel had an oral argument in the case of State v. Erick Arroyo in this Court on April 14, 2015. Counsel had an oral argument in the case of State v. Manuel Marin before the Supreme Court on April 8, 2015, as co-counsel with Robert M. Dudek. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Terrell Gilyard with this Court on March 26, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Kevin Bethel with this Court on March 26, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Dominique Lavar Williams with this Court on March 9, 2015. Counsel filed the brief of appellant in the case of State v. Tyrell Woods with the Court of Appeals on March 6, 2015. Counsel filed petition for rehearing in the case of State v. Akeem O. Smith with this Court on March 4, 2015. Counsel filed the brief of appellant in the case of State v. Gerald R. Williams in the Court of Appeals on February 27, 2015. Counsel filed the brief of appellant in the case of State v. Joseph Anthony Drachslin, Sr. in this Court on February 27, 2015. On February 26, 2015, along with co-counsel Robert M. Dudek, counsel filed a Petition for Extraordinary Relief in the Supreme Court in the capital case of Marion Alexander Lindsey v. State.

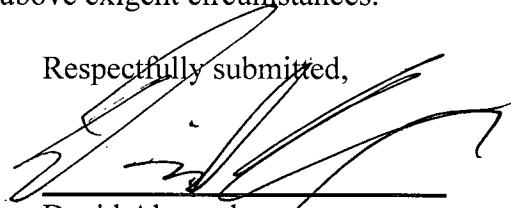
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

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.

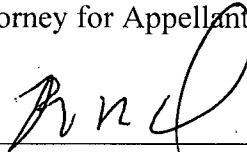
WHEREFORE, the undersigned counsel would respectfully request **a fourth and final thirty (30) day extension until June 15, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

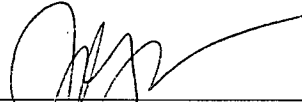


David Alexander
Appellate Defender

Attorney for Appellant



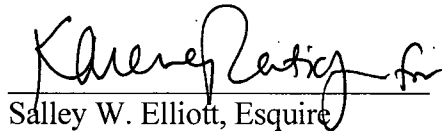
Robert M. Dudek
Chief Appellate Defender



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

This 15th day of May, 2015.

I consent:



Salley W. Elliott, Esquire