

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Richland County  
Clifton Newman, Circuit Court Judge

---

 ORIGINAL

RECEIVED

MAY 15 2015

SC Court of Appeals

RESPONDENT,

THE STATE,

V.

CALVERT MYERS,

APPELLANT.

APPELLATE CASE NO. 2014-001803

---

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

---

Counsel for appellant respectfully requests a **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. **Counsel will attempt to file the brief before the requested deadline if at all possible.** This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. 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.
2. Counsel 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 is currently working on the case of State v. Maurice Roberts where the brief is due with this Court on May 22, 2015. Counsel is currently working on the case of State v. William Pou where the petition for writ of certiorari to the Court of Appeals is due with the Supreme Court on May 25, 2015. Counsel is currently preparing for the oral argument in State v. Charles M. Harris to be held before the Supreme Court on June 3, 2015. Counsel prepared for and was a trainer in the Indigent Defense training (Public Defender 103) held April 27-29, 2015, in Beaufort, South Carolina. Counsel filed the reply to return to petition for writ of certiorari in the case of Sammie Louis Stokes v. State with the Supreme Court on Wednesday, April 22, 2015. Counsel had an oral argument in the case of State v. Darren Scott before the Supreme Court on Wednesday, April 22, 2015. Counsel filed the petition for rehearing in the case of State v. Richard Bill Niles, Jr. with the Supreme Court on Thursday, April 9, 2015. Counsel had an oral argument in the case of State v. Manual Marin before the Supreme Court on Wednesday, April 8, 2015. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, as stated above, training three new appellate defenders and reading all of their writings.**

4. Counsel filed the return to petition for writ of certiorari in the case of Melvin Daniel v. State of South Carolina with the Supreme Court on Thursday, April 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Armando K. Chestnut with this Court on April 2, 2015. Counsel filed the petition for writ of certiorari on the direct appeal in the case of State v. Albert Brandeberry with the Supreme Court on March 31, 2015. Counsel filed the United States certiorari petition in the case of Richard Moore v. State of South Carolina (3 issues) with the United States Supreme Court on March 23, 2015

5. Counsel makes this request in good faith and not for purpose of delay.
6. Counsel for the Attorney General's office consents to this request shown by signature below.

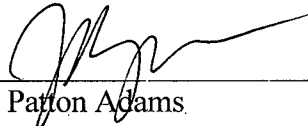
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until June 15, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



---

Robert M. Dudek  
Chief Appellate Defender

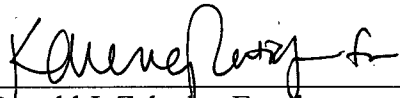


---

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

This 15th day of May, 2015.

I do not oppose:



---

Donald J. Zelenka, Esquire