

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
Steven H. John, Circuit Court Judge

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MAY 08 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

v.

JAMES E. BAILEY,

APPELLANT

APPELLATE CASE NO. 2014-002447

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

Counsel for James Bailey 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 for James Bailey 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.

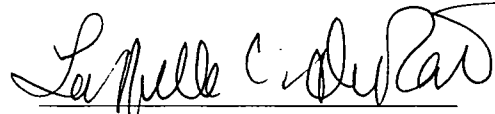
3. Counsel had an oral argument in the case of The State v. Shawn Reaves in the Supreme Court on May 6, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenwood Bright v. State of South Carolina with the Supreme Court on April 29, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis Lamar Bowser v. State of South Carolina with the Supreme Court on April 24, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ferris G. Singley v. State of South Carolina with the Supreme Court on April 14, 2015. Counsel had an oral argument in the case of The State v. Steve Young in this Court on April 13, 2015. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Christopher Taft in the Supreme Court on April 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Arthur Moseley with this Court on April 1, 2015. Counsel filed the brief of appellant in the case of The State v. Benjamin Lavon Smalls with this Court on March 25, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Yashawnus L. Patterson v. State of South Carolina with the Supreme Court on March 24, 2015. Counsel filed the brief of appellant in the case of The State v. Andre Green with this Court on March 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jermaine T. McKelvey v. State of South Carolina with the Supreme Court on March 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alvin S. Samuels v. State of South Carolina with the Supreme Court on March 9, 2015. Counsel filed the brief of appellant in the case of The State v. Barry Glenn Millwood with this Court on March 5, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jeffrey Davis with this Court on March 4, 2015. Counsel had an oral argument in the case of The State v. Demetrius Goodwin in

the Supreme Court on February 18, 2015. Counsel filed the brief of appellant in the case of The State v. Jonathan Allen Finney with this Court on February 13, 2015. Counsel had an oral argument in the case of The State v. Daniel Demond Griffin in this Court on February 11, 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.

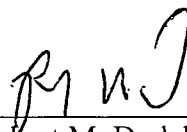
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a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

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

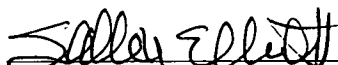
Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender

This 8th day of May, 2015.

I consent:


Salley W. Elliott, Esquire