

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Anderson County

G. Edward Welmaker, Circuit Court Judge

 ORIGINAL

RECEIVED
JUN 08 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

v.

JAMEL D. WATT,

APPELLANT

APPELLATE CASE NO. 2014-001594

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

Counsel for James Clyde Dill, Jr. respectfully requests a **fourth and final** 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 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 James Clyde Dill, Jr. 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.

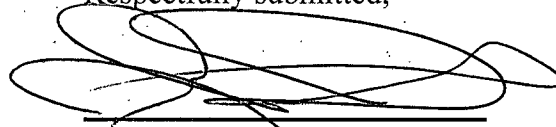
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daniel Martinez Herrera with the Court of Appeals on June 1, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Samuel Lamont Whitner v. State of South Carolina in the Supreme Court on May 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis M. Brown v. State of South Carolina in the Supreme Court on May 15, 2015. Counsel filed the initial reply brief of appellant in the case of The State v. O'Neal Bernard Byrdic, Jr. with the Court of Appeals on May 14, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kathryn King with the Court of Appeals on May 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gary Grant v. State of South Carolina in the Supreme Court on May 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny White v. State of South Carolina in the Supreme Court on April 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Reginald Murray v. State of South Carolina in the Supreme Court on April 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Deleorn Thompson v. State of South Carolina in the Supreme Court on April 15, 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.

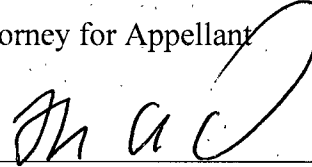
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

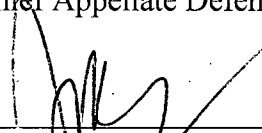


John H. Strom
Appellate Defender

Attorney for Appellant



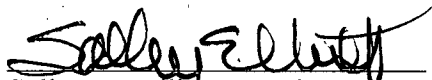
Robert M. Dudek
Chief Appellate Defender



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

This 8th day of June, 2015.

I consent:


Salley W. Elliott, Esquire