

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Greenville County

Steven H. John, Circuit Court Judge

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 ORIGINAL

RECEIVED  
JUN 08 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

v.

JAMES E. BAILEY

APPELLANT

APPELLATE CASE NO. 2014-002447

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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 for James Bailey respectfully requests a **fourth and final** extension of thirty (30) days **until July 8, 2015**, 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 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.

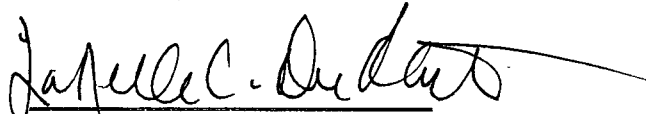
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Fred Jack Sanders with this Court on June 4, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dominique M. Ross with this Court on May 26, 2015. Counsel had an oral argument in the case of The State v. David Jakes in the Supreme Court on May 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Beneco Ganson with this Court on May 12, 2015. 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.

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.

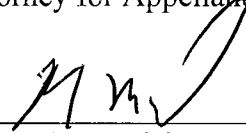
WHEREFORE, the undersigned counsel would respectfully request **a final thirty (30) day extension until July 8, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

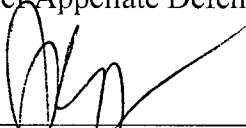


LaNelle C. Durant  
Appellate Defender

Attorney for Appellant




Robert M. Dudek  
Chief Appellate Defender



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

This 8<sup>th</sup> day of June, 2015.

I consent:

  
Salley W. Elliott, Esquire