

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Abbeville County

Donald B. Hocker, Circuit Court Judge

RECEIVED

JUN 15 2015

SC Court of Appeals

RESPONDENT,

THE STATE,

V.

KEITH DENVER TATE,

APPELLANT

APPELLATE CASE NO. 2014-001694

**PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER**

The undersigned counsel would respectfully request a thirty-day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today having been extended by two prior orders of this Court.
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Campbell in the Court of Appeals on June 12, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on

Appeal in the case of State v. Quoteas Nesbitt in this Court on June 9, 2015. Counsel filed the petitioner's reply brief in the case of Richard Moore v. State with the United States Supreme Court on June 8, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Kenneth Lynch with the Supreme Court on June 5, 2015. Counsel filed the petition for rehearing in the case of Michael Gonzales v. State in this Court on May 28, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. William Travis Calvert in this Court on May 27, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Terry L. McCarrell in this Court on May 21, 2015. Counsel the file petition for writ of certiorari to this Court in the case of State v. Marvin Bowens Green with the Supreme Court on May 21, 2015. Counsel filed the petition for stay of execution in the case of Stephen Corey Bryant v. State in the Supreme Court on May 12, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kevin L. Howard in this Court on May 12, 2015. Counsel filed the petition for rehearing in the case of State v. Walter Bash in this Court on May 7, 2015. Counsel argued in the case of State v. Ahmad Jamal Wilkins in this Court on May 6, 2015. Counsel argued in the case of Edward Andrell Whitner v. State in this Court on May 4, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gary Clifton Hamilton in this Court on April 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Carlos Luis Pinales Mejia v. State in the Supreme Court on April 27, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Darryl L. Drayton with the Supreme Court on April 20, 2015. Counsel filed the initial brief of appellant and

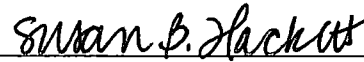
designation of matter in the case of State v. Kenneth Campbell in this Court on April 16, 2015.

3. This request is made in good faith, and not for purposes of delay.

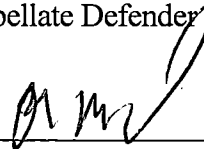
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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. Counsel requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



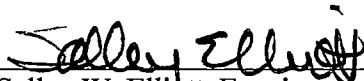
Susan B. Hackett
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

June 15, 2015

I DO NOT OPPOSE:



Salley W. Elliott, Esquire