

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Greenville County

R. Lawton McIntosh, Circuit Court Judge

RECEIVED

JUN 25 2015

SC Court of Appeals

IN THE MATTER OF THE CARE AND
TREATMENT OF CALVIN MILLER,

APPELLANT

APPELLATE CASE NO. 2014-001595

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

Counsel for Calvin Miller respectfully requests an extension of **final thirty (30) days, until July 27, 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 Calvin Miller 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 requested additional documents related to Appellant's case from the Greenville County Clerk of Court and is awaiting their arrival. Counsel filed the initial brief of

appellant and designation of matter in the case of State v. Michael Orlando Brown with the Court of Appeals on June 8, 2015. Counsel filed the reply to the state's return to petition for writ of certiorari in the case of Vladimir Pantovich v. State with the Supreme Court on June 5, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Conrad Slocumb with the Supreme Court on June 1, 2015. Counsel had an oral argument in the case of State v. Ashley Moore with the Supreme Court on May 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin Keith v. State with the Supreme Court on May 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Didier Sellner v. State with the Supreme Court on May 12, 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.

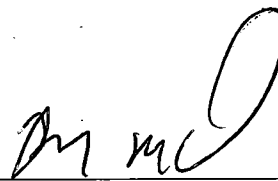
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until July 27, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

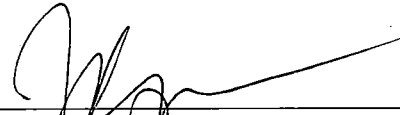


Laura R. Baer
Appellate Defender

Attorney for Appellant



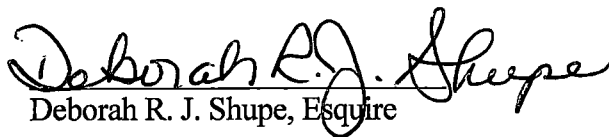
Robert M. Dudek
Chief Appellate Defender



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

This 25th day of June, 2015.

I consent:



Deborah R. J. Shupe, Esquire