

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Richland County
Alison Renee Lee, Circuit Court Judge

RECEIVED

JUL 08 2015

SC Court of Appeals
APPELLANT, Appeals

IN THE MATTER OF THE CARE AND TREATMENT OF
DAQUAN JOHNSON,

APPELLATE CASE NO. 2014-001959

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

Counsel for Daquan Johnson respectfully requests a **final fifteen (15) day extension, until July 23, 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 fifth request for an extension. This SVP case contains novel issues which require further investigation and research. Counsel has discussed these issues with the Chief Appellate Defender, and even though any extension beyond a fourth is strongly disfavored, he agrees this case justifies the extension. Counsel will endeavor to file the brief prior to the expiration of the fifteen days.** 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 four previous extensions.

2. Counsel for Daquan Johnson 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 a **Petition for Writ of Certiorari with the United States Supreme Court on July, 7, 2015, in the case of Anthony Jackson v. State of South Carolina.** Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Jeffrey Allen Chapman with this Court, together with a Motion to Certify the Case to the South Carolina Supreme Court on July 1, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Blaton Wakeem Smith with this Court on June 29, 2015. Counsel filed the petition for writ of certiorari to this Court and accompanying appendix in the case of State v. Akeem O. Smith with the Supreme Court on June 22, 2015. Counsel filed the brief of appellant in the case of State v. Tyress Antonio Littlejohn with this Court on June 12, 2015. Counsel had an oral argument in the case of State v. James Allen Johnson before this Court on June 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew S. Medley with this Court on June 8, 2015. Counsel filed the petition for rehearing in the case of State v. John E. Haynes with this Court on May 20, 2015. Counsel filed the brief of appellant in the case of State v. Stewart Ard with this Court on May 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Miama Kromah v. State of South Carolina with the Supreme Court on May 7, 2015. Counsel had an oral argument in the case of State v. Lamar Sequan Brown with this Court on May 5, 2015. Counsel filed the brief of appellant in the case of State v. Leonard Eugene Brockington with this Court on May 4, 2015. Counsel had an oral argument in the case of State v. Darren Scott before the Supreme Court on April 22, 2015, as co-counsel with Robert M. Dudek. Counsel filed the brief of appellant in the case of State v. Justin R. Simms with this Court on April 21, 2015. Counsel had an oral argument in the case of State v. Erick Arroyo in this Court on April 14, 2015. Counsel had an oral argument in the case of State v. Manuel Marin before the Supreme Court on April 8, 2015, as co-counsel with Robert M. Dudek

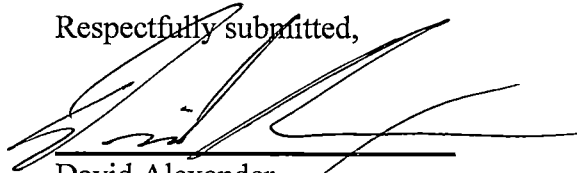
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

5. Counsel for the Attorney General's office consents to this request shown by signature below.

6. **Counsel will endeavor to file the brief before the expiration of the requested fifteen days.**

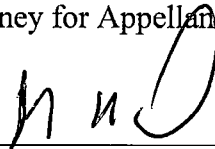
WHEREFORE, the undersigned counsel would respectfully request a **final fifteen (15) day extension until July 23, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

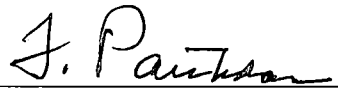


David Alexander
Appellate Defender

Attorney for Appellant



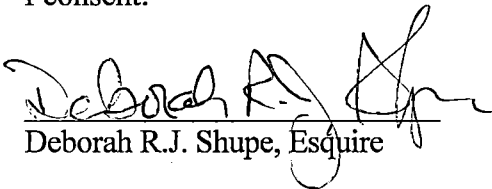
Robert M. Dudek
Chief Appellate Defender



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

This 8th day of July, 2015.

I consent:



Deborah R.J. Shupe, Esquire