

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Deadra L. Jefferson, Circuit Court Judge

 ORIGINAL

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JUL 06 2015

RESPONDENT,
SC Court of Appeals

THE STATE,

v.

DALE GOULD,

APPELLANT

Appellate Case No. 2014-0025547

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

The undersigned counsel respectfully requests 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 extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Warren Smith v. State with the Supreme Court on July 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Butler with this Court on June 30, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Orlando Brown with this Court 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.

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

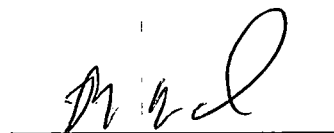
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully 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,



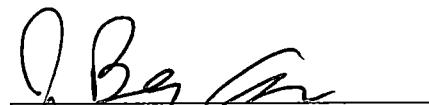
Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

July 6, 2015

I DO NOT OPPOSE:


for _____
Salley W. Elliott, Esquire