


STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Florence County  
Deadra L. Jefferson, Circuit Court Judge  
\_\_\_\_\_

 ORIGINAL  
RECEIVED

JUL 06 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JENNIFER LORENE HATFIELD GRIFFIN,

APPELLANT.

APPELLATE CASE NO. 2014-002042

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

Counsel for appellant respectfully requests a **final two day extension, 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. 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.
2. Counsel respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. *Counsel regrets having to request this extension and will make every effort to file the brief prior to the two day deadline. Counsel regrets having to*

**to make this final extension request, but it is absolutely necessary. The last two weeks have involved extensive administrative duties as explained below.**

3. Counsel is currently training three new appellate defenders and reading all of their writings. Counsel has had to interview applicants this week to replace the Administrative Coordinator and one legal assistant. Counsel is currently interviewing applicants to replace the Commission's receptionist who has been promoted to legal assistant.

4. Counsel filed the brief of appellant and designation of matter in the case of State v. Terry Hall with this Court on June 26, 2015. Counsel filed a petition for rehearing in the case of State v. Curtis J. Simms in the Supreme Court with co-counsel Susan Barber Hackett and co-counsel David Alexander on June 24, 2015. Counsel filed a redacted brief of appellant and designation of matter in the death penalty case of State v. Ricky Lee Blackwell in the Supreme Court with co-counsel David Alexander on June 18, 2015. Counsel filed a brief of petitioner in the case of State v. Antonio Miller with the Supreme Court on June 18, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. William Pou with the Supreme Court on June 15, 2015. Counsel filed the Return to the Motion to Dismiss as Interlocutory in the case of State v. Bryan Rearick with this Court on June 15, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Joshua Griffith with this Court on June 12, 2015. Counsel filed a Reply Brief in the case of Richard Bernard Moore v. State in the Supreme Court of the United States today with co-counsel Susan Hackett on June 8, 2015. Counsel filed a Return to Motion to Dismiss in the case of John William. Dixon v. State before the Supreme Court on June 8, 2015. Counsel argued the case of State v. Charles M. Harris before the Supreme Court on June 3, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in Michael A. Hough v. State with the Supreme Court on June 1, 2015, with co-counsel Lara Caudy. Counsel

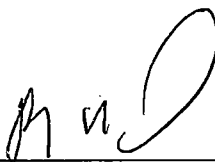
filed the brief with a novel double jeopardy issue in the case of State v. Bryan Rearick with this Court on May 29, 2015. Counsel filed motion to certify case for review by the Supreme Court in the case of State v. Bryan Rearick with the Supreme Court on May 29, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Maurice Roberts with this Court on May 22, 2015. Counsel prepared for and was a trainer in the Indigent Defense training (Public Defender 103) held April 27-29, 2015, in Beaufort, South Carolina. Counsel filed the reply to return to petition for writ of certiorari in the death penalty case of Sammie Louis Stokes v. State with the Supreme Court on Wednesday, April 22, 2015. Counsel had an oral argument in the case of State v. Darren Scott before the Supreme Court on Wednesday, April 22, 2015. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training three new appellate defenders and reading all of their writings; and interviewing applicants for three support staff positions.**

5. Given the extreme work responsibilities of undersigned counsel as Chief Appellate Defender, including his own heavy caseload, his having to read the briefs and certiorari petitions of three new Appellate Defenders in advance of their filing, and his Appellate Project oversight responsibilities, **counsel would request a final extension until July 8, 2015.** Counsel will make every effort to file the brief and designation before that deadline if at all possible. Counsel submits this is a very unusual situation and apologizes for the need to file this request to file the brief out-of time.

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

WHEREFORE, the undersigned counsel would respectfully request a **final two 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. **Counsel will endeavor to file the brief before the deadline if at all possible.** Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



---

Robert M. Dudek  
Chief Appellate Defender

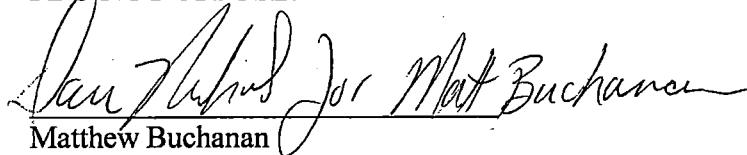


---

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

July 6, 2015

I DO NOT OPPOSE:



---

Matthew Buchanan