


STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Horry County

Steven H. John, Circuit Court Judge

 ORIGINAL
RECEIVED
JUL 13 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

CARNAIL MARCHINDLA GRAHAM,

APPELLANT

APPELLATE CASE NO. 2014-002336

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

Counsel respectfully requests an extension of thirty (30) days 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 third 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 two previous extensions.
2. Counsel 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.

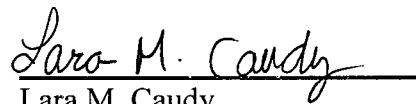
3. On July 6, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Frank Terrance Singleton, III with this Court. On June 17, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in David L. Parker v. State with the Supreme Court. On June 15, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Roy L. Jones with this Court. On June 12, 2015, counsel filed a brief of appellant and record on appeal in State v. Johnny Lee Irby with this Court. On June 3, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Laquavius T. Cleveland with this Court. On June 1, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Michael Hough with the Supreme Court. On May 21, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Eric Marsh v. State with the Supreme Court. On May 19, 2015, counsel filed an initial brief of appellant and record on appeal in State v. Jonathan Brown with this Court. On May 13, 2015, counsel filed an initial brief of appellant and designation of matter in State v. Roderick G. Wynn with this Court. On May 6, 2015, counsel held an oral argument in State v. Stepheno Alston before this Court. On May 6, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Elijah Baylock v. State with the Supreme Court. On May 1, 2015, counsel traveled to Aiken County for a hearing in State v. Barry Eugene Lafavor.

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.

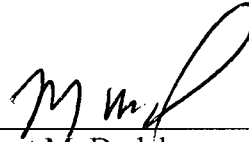
WHEREFORE, the undersigned counsel would respectfully request an additional thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Lara M. Caudy
Appellate Defender

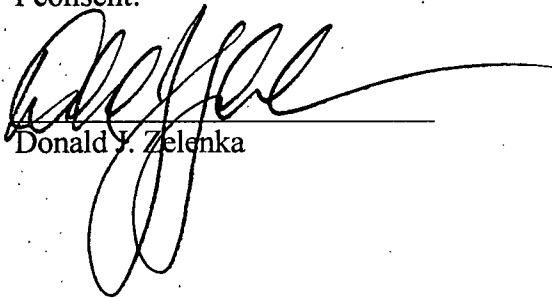
Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender

This 13th day of July, 2015

I consent:



Donald J. Zelenka