STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Saluda County

ORIGINAL

DeAndrea G. Benjamin, Circuit Court Judge

RECEIVED
JUL 06 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JOHNNY JEROME BOYD,

APPELLANT

APPELLATE CASE NO. 2014-002715

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.

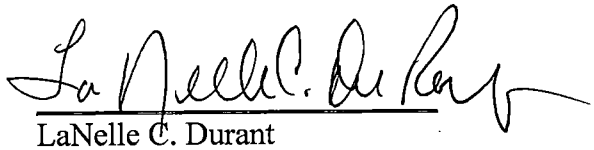
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. James Eddie Bailey with this Court on June 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Elvis Bostic v. State of South Carolina with the Supreme Court on June 25, 2015. Counsel filed the petition for rehearing in the case of The State v. Christopher Ryan Whitehead with the Supreme Court on June 23, 2015. Counsel filed the petition for rehearing in the case of The State v. David Eugene Rosier, Jr. with this Court on June 11, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Odouri L. Lytes v. State of South Carolina with the Supreme Court on June 10, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Fred Jack Sanders with this Court on June 4, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dominique M. Ross with this Court on May 26, 2015. Counsel had an oral argument in the case of The State v. David Jakes in the Supreme Court on May 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Beneco Ganson with this Court on May 12, 2015. Counsel had an oral argument in the case of The State v. Shawn Reaves in the Supreme Court on May 6, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenwood Bright v. State of South Carolina with the Supreme Court on April 29, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis Lamar Bowser v. State of South Carolina with the Supreme Court on April 24, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ferris G. Singley v. State of South Carolina with the Supreme Court on April 14, 2015. Counsel had an oral argument in the case of The State v. Steve Young in this Court on April 13, 2015. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Christopher Taft in the Supreme Court on April 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Arthur Moseley with this Court on April 1, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.

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

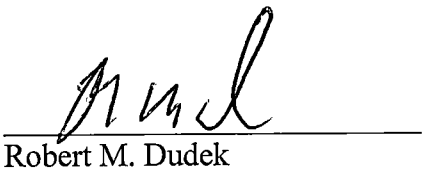
WHEREFORE, the undersigned counsel would respectfully request an additional thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

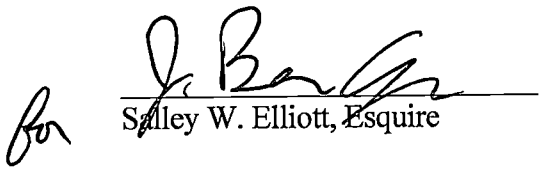
Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender

This 6th day of July, 2015

I consent:



for Salley W. Elliott, Esquire