

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Pickens County
Edward W. Miller, Circuit Court Judge

RECEIVED
JUL 13 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

LESTER MOSLEY,

APPELLANT

APPELLATE CASE NO. 2014-002064

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 Terrell Chandler v. State with the Supreme Court on July 6, 2015. Counsel filed the initial brief of appellant in the case of State v. James Wright with this Court on July 2, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian Beaton v. State with the Supreme Court on June 25, 2015. Counsel filed the initial brief of

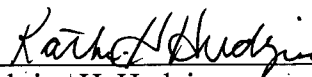
appellant and designation of matter in the case of State v. David Bowers with this Court on June 22, 2015. Counsel filed the brief of petitioner in the case of State v. Julio Hunsberger with the Supreme Court on June 19, 2015. Counsel filed the petition for rehearing in the case of State v. Bryan Holder with this Court on June 18, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Carmen Rice with the Supreme Court, on June 18, 2015. Counsel filed the reply to brief of petitioner pursuant to White v. State in the case of Clarence Cook v. State with the Supreme Court on June 3, 2015.

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

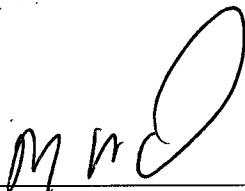
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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,



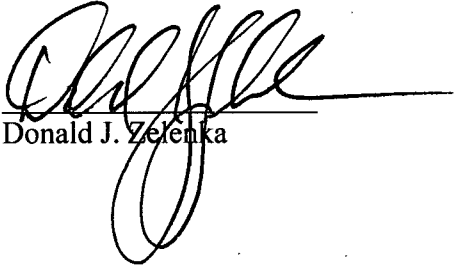
Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

July 13, 2015

I DO NOT OPPOSE:

A handwritten signature in black ink, appearing to read 'D. Zelenka', written over a horizontal line. The signature is stylized and cursive.

Donald J. Zelenka