

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Newberry County
Eugene C. Griffith, Jr., Circuit Court Judge

RECEIVED

JUL 31 2015

SC Court of Appeals

STATE,

RESPONDENT,

V.

MARIO V. GONZALEZ HERNANDEZ,

APPELLANT

APPELLATE CASE NO. 2014-002376

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 initial brief of appellant and designation of matter in the case of The State v. William Alexander with this Court on July 27, 2015. Counsel filed an initial brief of appellant in the case of In the Matter of the Care and Treatment of Daquan Johnson with this Court on July 23, 2015. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. John Edward Haynes with the Supreme Court on July 22, 2015. Counsel filed a petition for writ of certiorari in the case of The State v. Anthony Jackson with the United

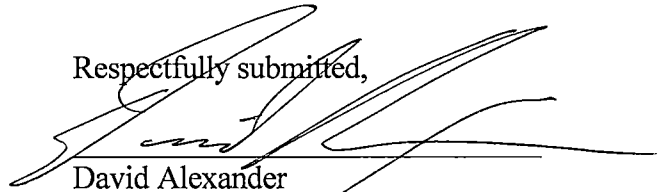
Stated Supreme Court on July, 7, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Jeffrey Allen Chapman with this Court on July 1, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Blaton Wakeem Smith with this Court on June 29, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Akeem O. Smith with the Supreme Court on June 22, 2015. Counsel filed the brief of appellant in the case of State v. Tyress Antonio Littlejohn with this Court on June 12, 2015. Counsel had an oral argument in the case of State v. James Allen Johnson before this Court on June 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew S. Medley with this Court on June 8, 2015. Counsel filed the petition for rehearing in the case of State v. John E. Haynes with this Court on May 20, 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.

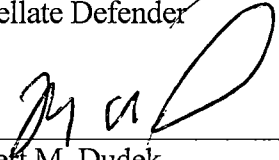
4. As indicated by the consent below, counsel for the state graciously consents to or does not oppose this request.

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,



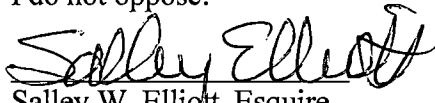
David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

July 31, 2015

I do not oppose:


Salley W. Elliott, Esquire