

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Pickens County
Letitia H. Verdin, Circuit Court Judge

RECEIVED
AUG 03 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

v.

CHRISTINA REECE,

APPELLANT

APPELLATE CASE NO. 2013-000656

PETITION FOR EXTENSION TO FILE
INITIAL REPLY BRIEF OF APPELLANT

The undersigned counsel respectfully requests a **final ten day extension until August 13, 2015**, in which to file the initial reply brief of appellant in the above-referenced case. **Counsel intends to file the initial reply brief of appellant before August 13, 2015.** In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial reply brief of appellant in this case is due to be served and filed today.
2. Counsel filed the brief of respondent and designation of matter in the case of State v. Whitlee Jones with the Supreme Court on July 29, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Raheem D. King in the Supreme Court, on July 27, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. Gary R. Dargan with this Court on July 24, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Robert Lee Moore with this Court on July 17, 2015.

Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Tawanda Allen with the Supreme Court on July 16, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. Rashondre Montese Boozer with this Court on July 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Craig Geathers v. State with the Supreme Court on July 10, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. Jennifer Lorene Hatfield Griffin with this Court on July 8, 2015. 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 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 has extensive administrative duties as the Chief Appellate Defender, including administrative and**

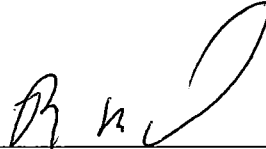
Appellate Project oversight, and, training three new appellate defenders and reading all of their writings.

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

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 **final ten day extension until August 13, 2015. Counsel intends to file the initial reply brief of appellant before August 13, 2015.** Counsel respectfully requests that the time limits for filing the initial reply brief of appellant be held in abeyance pending a ruling on this motion.

Respectfully submitted,



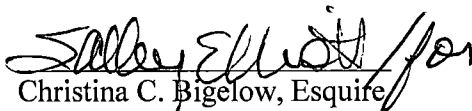
Robert M. Dudek
Chief Appellate Defender



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

August 3, 2015

I DO NOT OPPOSE:



Christina C. Bigelow, Esquire