

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Certiorari to Beaufort County

Brooks P. Goldsmith, Circuit Court Judge

RECEIVED

SEP 04 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

TRAVIS POLITE,

APPELLANT

APPELLATE CASE NO. 2015-000182

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

Counsel for Travis Polite respectfully requests a **final thirty (30) day extension, until October, 5 2015**, 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 fifth 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 four previous extensions.

2. Counsel for Travis Polite 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 petition for rehearing in the case of State v. Martin Floyd on July 29, 2015 with the Court of Appeals. Counsel filed the initial brief of appellant and designation of matter in the case

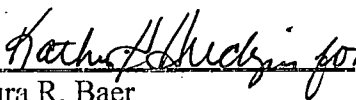
of State v. Stephon Robinson in the Court of Appeals on July 27, 2015. Counsel filed the reply to the return to petition for writ of certiorari in the case of Dider Sellner v. State with the Supreme Court on July 27, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Calvin Miller with the Court of Appeals on July 27, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Justin Johnson with the Court of Appeals on July 22, 2015. Counsel filed the petition for rehearing in the case of State v. Christopher Miller with the Supreme Court on July 8, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Warren Smith v. State with the Supreme Court on July 2, 2015.

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 a **final thirty (30) day extension until October 5, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

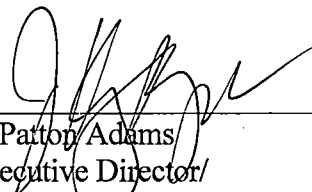


Laura R. Baer
Appellate Defender

Attorney for Appellant



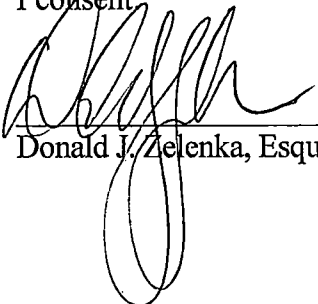
Robert M. Dudek
Chief Appellate Defender



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

This 4th day of September, 2015.

I consent:



Donald J. Zelenka, Esquire