

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

ORIGINAL

Appeal from Charleston County

RECEIVED

Stephanie P. McDonald, Circuit Court Judge

AUG 28 2015

SC Court of Appeals

THE STATE,

APPELLANT,

V.

MARVIN BROWN,

RESPONDENT

APPELLATE CASE NO. 2014-002129

**PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER**

The undersigned counsel would respectfully request a thirty-day extension in which to file the initial brief of respondent and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The initial brief of respondent and designation of matter in this case are due to be served and filed today having been extended by two prior orders of this Court.
2. Counsel filed the return to petition for writ of certiorari in the case of Michael Milledge v. State in the Supreme Court on August 28, 2015. Counsel filed the return to petition for writ of certiorari in the case of Steven Lee Hewitt v. State in the

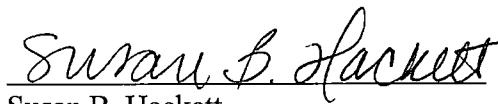
Supreme Court on August 21, 2015. Counsel filed the brief of respondent in the case of Matthew Taylor v. State in this Court on August 19, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Keith Denver Tate in this Court on August 14, 2015. Counsel filed the petition for rehearing in the case of State v. Nathaniel B. Beeks in this Court on August 13, 2015. Counsel filed the petition for rehearing in the case of State v. Ahmad Jamal Wilkins in this Court on July 31, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donovan R. Pringle v. State in the Supreme Court on July 30, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Walter M. Bash in the Supreme Court on July 24, 2015. Counsel filed the brief of petitioner in the case of Fred R. Rutland v. State in the Supreme Court on July 22, 2015. Counsel filed the petition for writ of certiorari to this Court in the case of Michael Gonzales v. State in the Supreme Court on July 20, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Faron M. Clements in this Court on July 10, 2015. Counsel filed the reply to the return to petition for writ of certiorari to this Court in the case of State v. Marvin Bowens Green in the Supreme Court on June 29, 2015. Counsel filed the initial reply brief of appellant in the case of State v. Robert Odell Brown in this Court on June 29, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Shaheed Hayes in this Court on June 29, 2015.

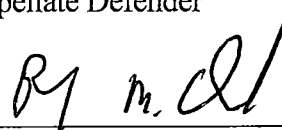
3. This request is made in good faith, and not for purposes of delay.

4. As indicated by his 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 in which to file the initial brief of respondent and designation of matter in this case. Counsel requests that the time limits for filing the initial brief of respondent and designation of matter be held in abeyance pending a ruling on this motion.

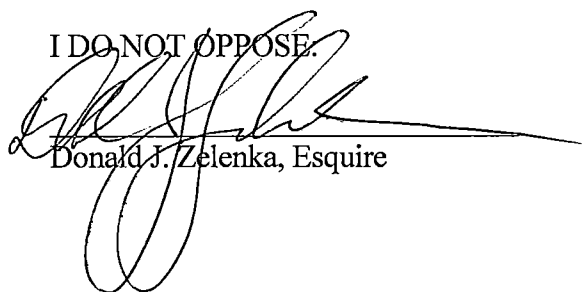
Respectfully submitted,


Susan B. Hackett
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

August 28, 2015

I DO NOT OPPOSE.


Donald J. Zelenka, Esquire