

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Greenville County

Edward W. Miller , Circuit Court Judge  
\_\_\_\_\_

 ORIGINAL

**RECEIVED**

AUG 31 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

v.

RAYMOND YOUNG,

APPELLANT

APPELLATE CASE NO. 2013-000149  
\_\_\_\_\_

PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER  
\_\_\_\_\_

The undersigned counsel respectfully requests a **final thirty day extension, until September 30, 2015**, 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 State v. David Chiles Jr. with this Court on August 26, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Garris v. State with the Supreme Court on August 26, 2015. Counsel filed the petition for writ of certiorari and accompanying

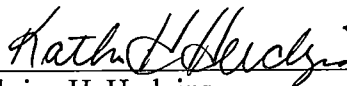
appendix in the case of Keion Griffin v. State with the Supreme Court on August 26, 2015. Counsel filed the brief of petitioner in the case of Reginald Montgomery v. State with the Supreme Court on August 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Asheron Holloway v. State with the Supreme Court on August 11, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Channack Keam v. State with the Supreme Court on August 4, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gartharee Hinson with this Court on July 27, 2015. Counsel filed the initial brief of appellant in the case of State v. Manuel Pacheco with this Court on July 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.

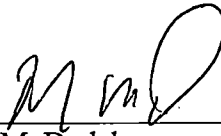
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until September 30, 2015**. 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,

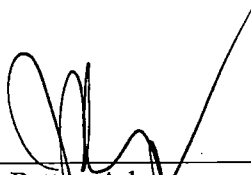


Kathrine H. Hudgins  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

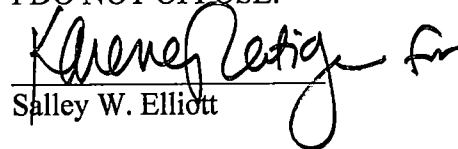


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T. Patton Adaras  
Executive Director  
J. Hugh Ryan, III  
General Counsel

August 31, 2015

I DO NOT OPPOSE:



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Salley W. Elliott