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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

SEP 25 2015

SC Court of Appeals

Appeal from Lexington County

William P. Keesley, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

QUENTIN RAYMAR PRICE,

APPELLANT

APPELLATE CASE NO. 2015-001779

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 on September 30, 2015.
2. Counsel for Appellant is a full time public defender in the Eleventh Judicial Circuit with a case load of approximately 125 General Sessions cases pending in Lexington County, as well as a magistrate appeal that is pending in Circuit Court and is scheduled for oral arguments on October 5, 2015.

3. Since the date of filing of the Amended Notice of Appeal, counsel for Appellant has had to appear for a full term of General Sessions Court and was required to attend training at the annual Public Defender Conference.

3. Because of the procedural posture of this case as an appeal that is being refiled after it was previously remanded to the Circuit Court to address a Petition for Rehearing, counsel for Appellant was unclear as to the deadlines and dates for filing, particularly since the transcript was already requested and received the first time that the appeal was filed.

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

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,



Jael D. Gilreath
Assistant Public Defender
Eleventh Judicial Circuit
407 West Main Street
Lexington, SC 29072
(803) 785-8873
SC Bar No.: 100090

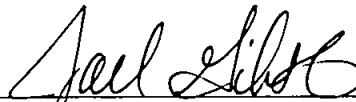
March 25, 2015

3. Since the date of filing of the Amended Notice of Appeal, counsel for Appellant has had to appear for a full term of General Sessions Court and was required to attend training at the annual Public Defender Conference.

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

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.

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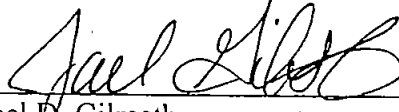
QUENTIN RAYMAR PRICE,

APPELLANT

APPELLATE CASE NO. 2014-002208

CERTIFICATE OF SERVICE

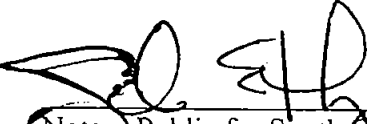
The undersigned attorney hereby certifies that a true copy of the petition for extension to file the initial brief of appellant and designation of matter in the above referenced case has been served upon Salley W. Elliott, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, via U.S. Mail this 25th day of September, 2015.



Jael D. Gilreath
Assistant Public Defender

ATTORNEY FOR APPELLANT
SC Bar No.: 100090

SUBSCRIBED AND SWORN TO before me
this 25th day of September, 2015.



Notary Public for South Carolina
My Commission Expires 3-25-2014