

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Charleston County

Stephanie P. McDonald, Circuit Court Judge

RECEIVED

SEP 28 2015

THE STATE,

SC Court of Appeals
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 **final thirty-day extension until October 28, 2015** 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 three prior orders of this Court.
2. Counsel filed the petition for writ of certiorari to this Court in the case of Ahmad Wilkins v. State in the Supreme Court on September 25, 2015. Counsel attended the Annual Public Defender Conference from September 21, 2015 through September 23,

2015 in Myrtle Beach, South Carolina. Counsel argued in the case of State v. Harold Bennon Cartwright in this Court on September 17, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert T. Kronsberg in this Court on September 8, 2015. Counsel filed a petition for writ of certiorari in the case of Stephen Corey Bryant v. State in the Supreme Court of the United States on September 3, 2015. Counsel filed the petition for rehearing in the case of State v. Leonard Eugene Jenkins in this Court on September 3, 2015. 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.

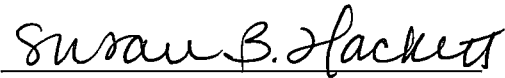
3. This request is made in good faith, and not for purposes of delay.

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

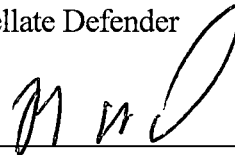
WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension until October 28, 2015** in which to file the initial brief of respondent and

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.

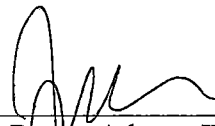
Respectfully submitted,



Susan B. Hackett
Appellate Defender



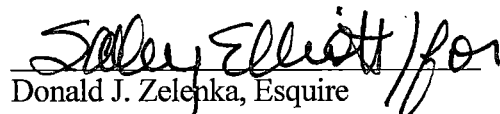
Robert M. Dudek
Chief Appellate Defender



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

September 28, 2015

I DO NOT OPPOSE:



Donald J. Zelenka, Esquire