

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Marion County
Donald B. Hocker, Circuit Court Judge

STATE,

RECEIVED

RESPONDENT, SEP 14 2015
SC Court of Appeals

V.

KEMONIE LASHAWN JONES,

APPELLANT

APPELLATE CASE NO. 2015-000522

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 today.

2. On September 10, 2015 counsel had an oral argument before this Court in the case of The State v. William Bolt. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Rishawn Reeder v. The State with the Supreme Court on September 8, 2015. Counsel filed a return to petition for writ of certiorari to the Court of Appeals in the case of Charles Ray Dean v. State of South Carolina with the Supreme Court on September 8, 2015. On August 31, 2015, counsel had two hearings in the Circuit Court: a hearing in Orangeburg County

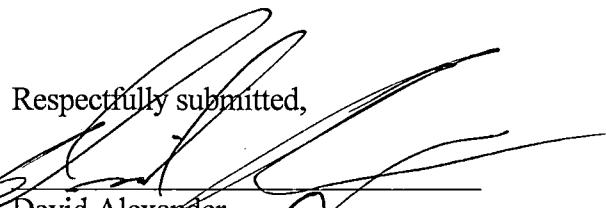
before the Honorable Deadra L. Jefferson in State v. Tykeem May; and a hearing in Chesterfield County held before the Honorable Larry B. Hyman, Jr. in Noah Mumford v. State. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Jeffrey Riebe v. The State, with the Supreme Court on August 27, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tyrone D. Ellison with this Court on August 25, 2015. Counsel filed a return to petition for writ of certiorari in the case of The State v. Erick Arroyo with the Supreme Court on August 14, 2015. Counsel filed a petition for certiorari and accompanying appendix in the case of Jeremiah Turner v. State of South Carolina with the Supreme Court on August 13, 2015. Counsel filed the petition for rehearing in the case of The State v. James Allen Johnson on August 12, 2015 with this Court. Counsel filed the brief of petitioner in the case of Brenda Gail Cutro v. State of South Carolina on August 12, 2015 with the Supreme Court. Counsel filed a petition for rehearing in the case of The State v. Sheldon Lamar Kelly on August 12, 2015 with this Court. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Quanel Marquan McIlwain with this Court on August 10, 2015. Counsel filed the final brief of appellant in the case of The State v. Jimmy Turner, with this Court on August 5, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. William Alexander with this Court on July 27, 2015. Counsel filed an initial brief of appellant in the case of In the Matter of the Care and Treatment of Daquan Johnson to this Court on July 23, 2015. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. John Edward Haynes with the Supreme Court on July 22, 2015. Counsel filed a petition for writ of certiorari in the case of The State v. Anthony Jackson with the United States Supreme Court on July 7, 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

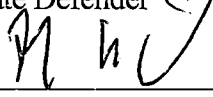
hopefully become more manageable in the near future, and less extensions will need to be requested.

4. As indicated by the 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. 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,


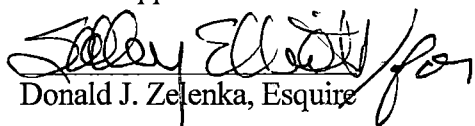
David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

September 14th, 2015

I do not oppose:



Donald J. Zelenka, Esquire