

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County
Carmen T. Mullen, Circuit Court Judge

 ORIGINAL

STATE,

v.

TERRANCE SEABROOK,

RECEIVED
NOV 9 2015
RESPONDENT
SC Court of Appeals

APPELLANT

APPELLATE CASE NO. 2015-001495

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel respectfully requests a **fourth and final** extension of thirty (30) days **until December 9, 2015**, in which to file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for Terrance Seabrook respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

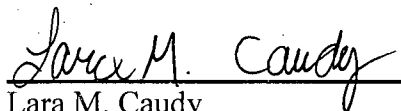
3. On November 6, 2015 Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Saire Castro v. The State with the Supreme Court. On November 4, 2015, Counsel filed the initial brief of appellant and designation of matter in the case of The State v. London A. Kelley with this Court. On October 26, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Stepheno Jermaine Alston with the Supreme Court. On October 22, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Montez Barker v. State with the Supreme Court. On October 14, 2015, counsel filed the brief of appellant and designation of matter in State v. Ricky L. Hayes with this Court. On October 13, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Keith Desue v. State with the Supreme Court. On October 12, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Harold Watts v. State with the Supreme Court. On October 2, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Levon D. Black v. State with the Supreme Court. On October 1, 2015, counsel filed the brief of appellant and designation of matter in State v. Carnail Marchindla Graham with this Court. On September 21-23, 2015, counsel attended the Public Defender Conference in Myrtle Beach. On September 18, 2015, counsel filed a petition for rehearing in State v. Tiphani Marie Parkhurst with this Court. On September 15, 2015, counsel held an oral argument in State v. Don Survi Chisolm before this Court. On September 8, 2015, counsel held an oral argument in State v. Frankie Lee Bryant before this Court.

4. Counsel makes this request in good faith and not for purpose 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.

5. Counsel for the Attorney General's office consents to this request shown by signature below.

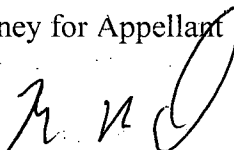
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **December 9, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

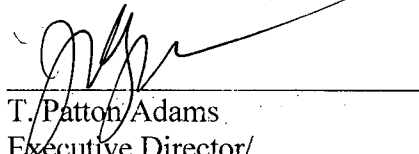


Lara M. Caudy
Appellate Defender

Attorney for Appellant



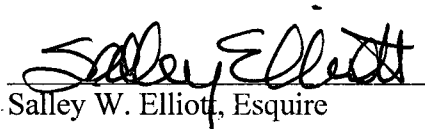
Robert M. Dudek
Chief Appellate Defender



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

This 9th day of Novemeber, 2015.

I consent:



Salley W. Elliott, Esquire