

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**ORIGINAL**

Appeal from Hampton County  
Perry M. Buckner, Circuit Court Judge

STATE,

RECEIVED  
RESPONDENT  
NOV 09 2015  
SC Court of Appeals

v.

DALONTE GREEN,

APPELLANT

APPELLATE CASE NO. 2015-001059

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. Counsel filed a return to petition for writ of certiorari in the case of Marshall H. Collins v. State with the Supreme Court on October 30, 2015. Counsel filed an initial brief of appellant and designation of matter in State v. Jason Kinloch with this Court on October 16, 2015. Counsel held an oral argument before this Court in the case of State v. Nathaniel Witherspoon on October 14, 2015. Counsel held an oral argument before this Court in the case of James Clayton Helms v. State on October 13, 2015. Counsel filed the brief of appellant and record on appeal in the

case of State v. Tre'Vaughn Jackson with this Court on September 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Vernon Michael Wilcox v. State with the Supreme Court on September 8, 2015. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training three new appellate defenders and reading all of their writings.**

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.

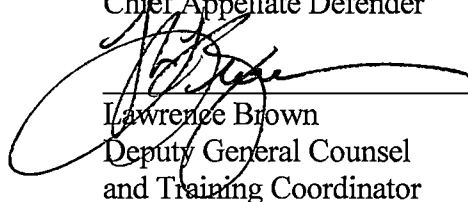
4. As indicated by the consent below, counsel for the state graciously consents to or does not oppose this request.

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,



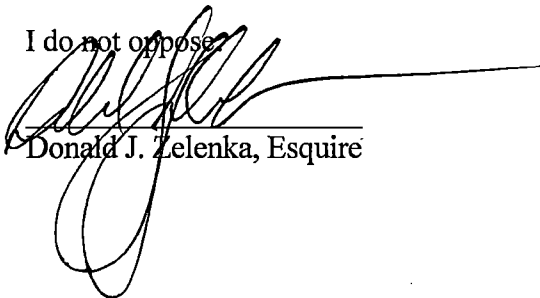
Robert M. Dudek  
Chief Appellate Defender



Lawrence Brown  
Deputy General Counsel  
and Training Coordinator

November 9<sup>th</sup>, 2015

I do not oppose



Donald J. Zelenka, Esquire