

STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY

Thomas A. Russo, Circuit Court Judge

 ORIGINAL

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DEC 04 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

KEITH CHRISTOPHER OSBORNE,

APPELLANT

APPELLATE CASE NO. 2014-002206

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

Counsel for appellant respectfully requests an extension of thirty (30) days, **until January 4th, 2016**, 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 third 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 two previous extensions.
2. Counsel for appellant 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 his caseload, counsel hopes that no further extension requests will be required.

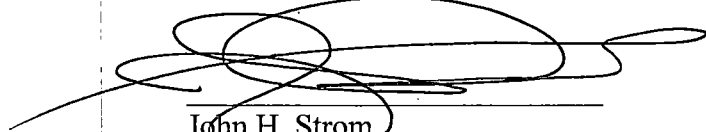
3. Counsel filed the initial reply brief in the case of Jarvis Gibbs v. State of South Carolina in the Supreme Court on November 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Beatson v. State of South Carolina in the Supreme Court on November 30, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Lance L. Miles with the Court of Appeals on November 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Addie Thilavanh v. State of South Carolina in the Supreme Court on November 13, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Farris v. State of South Carolina in the Supreme Court on October 27, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Matthew Gunter with the Court of Appeals on October 26, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Walter Alley v. State of South Carolina in the Supreme Court on October 13, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jarrod Keykendall Harris v. State of South Carolina in the Supreme Court on October 13, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donald Roberts v. State of South Carolina in the Court of Appeals on October 12, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jo Pradubsri with the Court of Appeals on October 12, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joseph Paugh v. State of South Carolina in the Supreme Court on October 7, 2015.

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

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

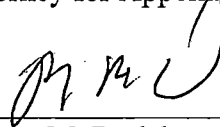
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, **until January 4th, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



John H. Strom
Appellate Defender


Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender

This 4th day of December, 2015.

I consent:


Benjamin Aplin, Esquire