

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

**ORIGINAL**

**RECEIVED**

DEC 09 2015

RESPONDENT  
SC Court of Appeals

STATE,

V.

TERRANCE SEABROOK,

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 for Terrance Seabrook respectfully requests a **final five (5) day extension, until December 14, 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 fifth 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 four previous extensions. **Counsel understands that a fifth extension is strongly disfavored.**

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. **Counsel regrets having to request this extension and will make every effort to file the brief prior to the five day deadline. This case involves an appeal from a reconstruction hearing after this Court remanded the case to reconstruct the record of Appellant's trial.**

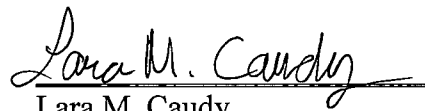
3. On December 8, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in the case of Billy Lisenby v. The State with the Supreme Court. On December 2, 2015, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Barry Eugene Lafavor with this Court. On November 30, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in the case of Antwan Grayson v. The State with the Supreme Court. On November 23, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Tiphani Marie Parkhurst with the Supreme Court. On November 23, 2015, counsel filed the initial brief of appellant and designation of matter in In the Matter of the Care and Treatment of Randall Wade McCoy with this Court. On November 12, 2015, counsel filed a petition for rehearing in State v. Don-Survi Chisolm with this Court. On November 10, 2015, counsel filed the petition for writ of certiorari and accompanying appendix in Detrick Walker v. State with the Supreme Court. On November 6, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Saire Castro v. State with the Supreme Court. On November 4, 2015, counsel filed the initial brief of appellant and designation of matter in 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 initial brief of appellant and designation of matter in State v. Ricky L. Hayes with 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.

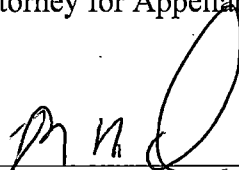
WHEREFORE, the undersigned counsel would respectfully request a **final five (5) day extension until December 14, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

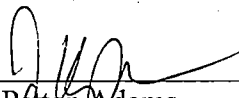


Lara M. Caudy  
Appellate Defender

Attorney for Appellant



Robert M. Dudek  
Chief Appellate Defender



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

This 9th day of December, 2015.

I consent:



J. Benjamin Aplin, Esquire