

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Anderson County
R. Lawton McIntosh, Circuit Court Judge

STATE,

v.

KYNDRA L. HOWELL,

RECEIVED
NOV 30 2015
RESPONDENT,
SC Court of Appeals

APPELLANT

APPELLATE CASE NO. 2015-000722

MOTION FOR EXTENSION OF TIME
IN WHICH 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 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 motion, counsel shows:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today. The Court has granted counsel two previous extensions.
2. Counsel 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. Today, counsel filed a petition for writ of certiorari and accompanying appendix in Antwan Grayson v. 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. 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 initial 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.

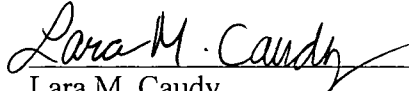
4. Counsel makes this request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that her

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

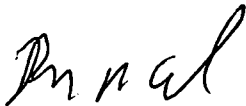
5. Counsel for the Attorney General's Office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request an additional thirty day extension 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



Robert M. Dudek
Chief Appellate Defender

November 30, 2015

I do not oppose:



Salley W. Elliott, Esquire