

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Williamsburg County
Clifton Newman, Circuit Court Judge

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THE STATE,

S.C. Supreme Court

RESPONDENT,

V.

JASON THOMAS BOSTON,

APPELLANT

APPELLATE CASE NO. 2015-000753

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

Counsel for Jason Thomas Boston respectfully requests an extension of **final thirty (30) days, until December 18, 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 Jason Thomas Boston 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.

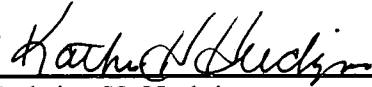
3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Gardner with the Court of Appeals on November 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dustin Simmons v. State with the Supreme Court on November 12, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Watson v. State with the Supreme Court on November 12, 2015. Counsel presented an oral argument in the Supreme Court in the case of State v. Michael Pearson on November 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Telly Manning v. State with the Supreme Court on October 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tony Medford v. State with the Supreme Court on October 19, 2015.

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.

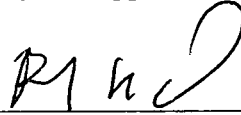
WHEREFORE, the undersigned counsel would respectfully request an **final thirty (30) days, until December 18, 2015**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Kathrine H. Hudgins
Appellate Defender

Attorney for Appellant




Robert M. Dudek
Chief Appellate Defender



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

This 18th day of November, 2015.

I consent:



Salley W. Elliott, Esquire