

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Spartanburg County
Roger L. Couch, Circuit Court Judge

RECEIVED

DEC 21 2015

S.C. Supreme Court

THE STATE,

RESPONDENT,

v.

RICKY LEE BLACKWELL,

APPELLANT

APPELLATE CASE NO. 2014-000610

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE INITIAL
REPLY BRIEF OF APPELLANT

Counsel for Ricky Lee Blackwell respectfully requests a **final extension of ten (10) days** in which to file the initial reply brief of appellant 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 a ten day extension. In support of this request, counsel shows:

1. The initial reply brief of appellant is due to be served and filed with the Court today.
2. Counsel for Ricky Lee Blackwell 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. On December 14, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in the case of Anthony Edwards v. The State of South Carolina with this Court. On December 14, 2015 counsel filed a petition for writ of certiorari and accompanying appendix in the case of Andrew S. Plummer v. State of South Carolina with this Court. On December 7, 2015, counsel had an oral argument in the case of The State v. Bradley Gerald Mullins before the Court of Appeals. On December 2, 2015, counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Calvin Jermaine Pompey with this Court. On December 1, 2015, counsel had an oral argument in the case of The State v. Tawanda Allen with this Court. On November 20, 2015, Counsel filed an amended initial brief in the case of The State v. Bryan Rearick with this Court. Counsel, along with co-counsel Lara M. Caudy, filed a petition for rehearing in the case of The State v. Don-Survi Chisolm on November 12, 2015 with the Court of Appeals. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jalann Williams with the Court of Appeals on November 10, 2015. Counsel filed a return to petition for writ of certiorari in the case of Marshall H. Collins v. State of South Carolina on October 30, 2015 with this Court. Counsel filed an initial brief of appellant and designation of matter in State v. Jason Kinloch with the Court of Appeals on October 16, 2015. Counsel held an oral argument before the Court of Appeals in the case of State v. Nathaniel Witherspoon on October 14, 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.**

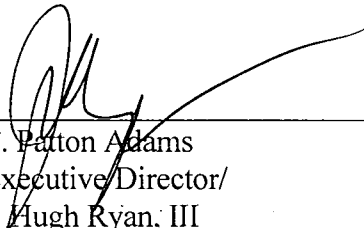
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a final ten day extension, in which to file the initial reply brief of appellant in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender



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

December 21, 2015

STATE OF SOUTH CAROLINA
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Appeal from Spartanburg County
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THE STATE,

RESPONDENT,

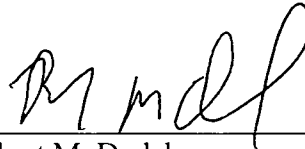
V.

RICKY LEE BLACKWELL,

APPELLANT

CERTIFICATE OF SERVICE


I certify that a true copy of the motion for an extension of time in which to file the initial reply brief of appellant in the above case has been served upon Melody J. Brown, Esquire, Senior Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 21st day of December, 2015.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR APPELLANT

SWORN TO BEFORE ME this 21st day
of December, 2015.


_____(L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.