

4th AFB due 12/30/15

(S)

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Berkeley County
Kristi Lea Harrington, Circuit Court Judge

RECEIVED

DEC 30 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JOSHUA JAMES PARKER,

APPELLANT

APPELLANT CASE NO. 2015-001287

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

Counsel for Joshua James Parker respectfully requests an extension of **final thirty (30) days, until February 1, 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 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 Joshua James Parker 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.

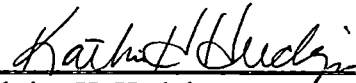
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darrin Holston v. State with the Supreme Court on December 21, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tremaine Wray v. State with the Supreme Court on December 21, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jason Thomas Boston with the Court of Appeals on December 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey Moore v. State with the Supreme Court on December 7, 2015. Counsel filed the petition for rehearing in the case of State v. Gary R. Thompson with the Court of Appeals on December 3, 2015. Counsel presented an oral argument in the Supreme Court in the case of State v. Julio A. Hunsberger on December 2, 2015. 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.

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.

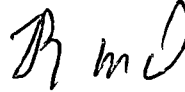
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until February 1, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Kathrine H. Hudgins
Appellate Defender

Attorney for Appellant



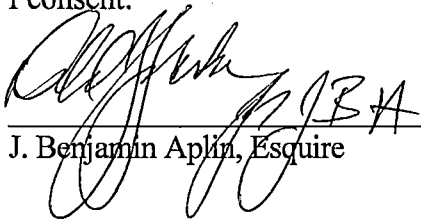
Robert M. Dudek
Chief Appellate Defender



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

This 30th day of December, 2015.

I consent:



J. Benjamin Aplin, Esquire