

STATE OF SOUTH CAROLINA

 ORIGINAL

In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY

Thomas A. Russo, Circuit Court Judge

RECEIVED

JAN 04 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

KEITH CHRISTOPHER OSBORNE,

APPELLANT

APPELLATE CASE NO. 2014-002206

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

Counsel for appellant respectfully requests a **fourth and final** extension of thirty (30) days **until February 3, 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 appellant 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. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Curtis Nealey v. The State of South Carolina in the Supreme Court on December 29, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tunzy Sanders v. State of South Carolina in the Supreme Court on December 21, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Russell Alan Tupper with the Court of Appeals on December 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Fredrick Martineze Pearson v. State of South Carolina in the Supreme Court on December 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Terrance D. Patterson v. State of South Carolina in the Supreme Court on December 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rodney Ivey v. State of South Carolina in the Supreme Court on December 9, 2015. Counsel had an oral argument in the case of The State v. James Clyde Dill, Jr. in the Court of Appeals on December 7, 2015. Counsel filed the Explanation of Appeal Pursuant to Rule 203(d)(1)(B), SCACR in the case of The State v. Favian Hayes with the Court of Appeals on December 2, 2015. Counsel filed the initial reply brief in the case of Jarvis Gibbs v. State of South Carolina in the Supreme Court on November 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Beatson v. State of South Carolina in the Supreme Court on November 30, 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.

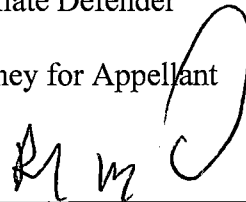
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until until February 3, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

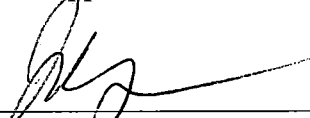


John H. Strom
Appellate Defender

Attorney for Appellant



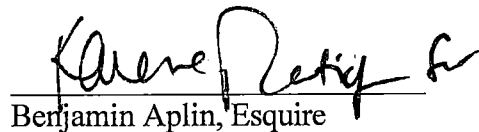
Robert M. Dudek
Chief Appellate Defender



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

This 4th day of January, 2016.

I consent:



Benjamin Aplin, Esquire