

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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 ORIGINAL

Appeal from Dorchester County  
Maite Murphy, Circuit Court Judge

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RECEIVED

JAN 04 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

RALPH MARTIN,

APPELLANT

Appellate Case No. 2015-000311

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PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER

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The undersigned counsel respectfully requests a **fourth and final extension until February 3, 2016** in which to file the initial brief of appellant and designatin of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.

2. Counsel for Ralph Martin 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 no further extensions 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 in this Court 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 in this Court 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 in this Court 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 petition for writ of certiorari and accompanying appendix in the case of Tony Medford v. State with the Supreme Court on October 19, 2015. Counsel presented an oral argument in this Court in the case of Sammy Lee Scarborough v. State on October 14, 2015.

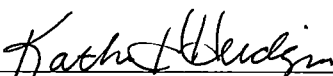
Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyrone Wade v. State with the Supreme Court on October 12, 2015.

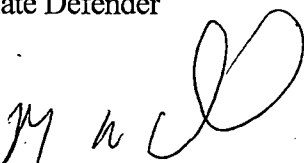
4. This request is made in good faith, and not for purposes of delay.

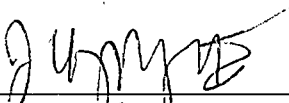
5. Counsel for the Attorney General's office consents to this request shown by signature below.

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

Respectfully submitted,

  
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Kathrine H. Hudgins  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

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

January 4, 2016

I DO NOT OPPOSE:

  
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J. Benjamin Applin, Esquire