

Brd AFB due 1/11/16

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Michael G. Nettles, Circuit Court Judge

RECEIVED

JAN 11 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

VANESSA LAQUETTA FRAYER,

APPELLANT

Appellate Case No. 2015-001823

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

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of appellant and designation 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 filed the initial reply brief of appellant in the case of State v. Stephon Robinson with the Court of Appeals on December 29, 2015. Counsel filed the Brief of Petitioner in the case of Didier Van Sellner 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. Desmond Green with the Court of Appeals on December 17, 2015. Counsel filed the Re-Petition for Writ Certiorari in the case of Shannon McGee v. State with the Supreme Court on December 10, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State

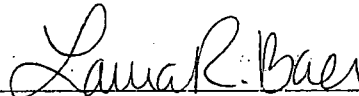
v. Travis Abe Polite with the Court of Appeals on November 30, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Marvin Brock Johnson with the Court of Appeals on November 25, 2015.

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

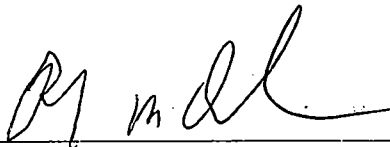
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Laura R. Baer  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

January 11, 2016

I DO NOT OPPOSE:



Benjamin J. Aplin, Esquire