

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Anderson County
R. Scott Sprouse, Circuit Court Judge

RECEIVED

JAN 29 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JEREMIAH CHRISTIAN JOHNSON,

APPELLANT

Appellate Case No. 2015-001405

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 intends to file the petition for writ of certiorari in the case of Anthony Riggins v. State with the Supreme Court on February 1, 2016 and has been preparing for the oral argument in State v. Mandy Lenore Smith in the Court of Appeals on February 2, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Calvin Miller with the Court of Appeals on January 15, 2016. 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

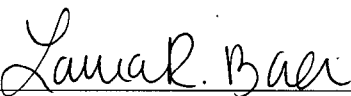
December 21, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Desmond Green with the Court of Appeals on December 17, 2015. Counsel filed the Re-Petition for Writ Certiorari in the case of Shannon McGee v. State with the Supreme Court on December 10, 2015.

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

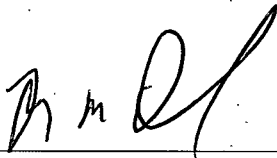
4. As indicated by his consent below, counsel for the State graciously consents to or does not oppose this request.

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 29, 2016

I DO NOT OPPOSE:



Donald J. Zeleznka, Esquire