

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Charleston County

Michael G. Nettles, Circuit Court Judge

RECEIVED

FEB 10 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

VANESSA LAQUETTA FRAYER,

APPELLANT

Appellate Case No. 2015-001823

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

Counsel for Vanessa Laquetta Frayer respectfully requests an extension of **final thirty (30) days, until March 11, 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 Vanessa Laquetta Frayer 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.

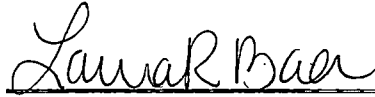
3. Counsel presented an oral argument in the Court of Appeals in the case of State v. Mandy L. Smith on February 9, 2016. Counsel filed the petition for writ of certiorari in the case of Anthony M. Riggins v. State with the Supreme Court on February 3, 2016. Counsel filed the initial reply brief of appellant 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.

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.

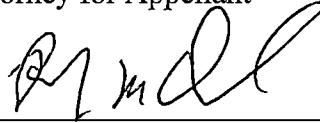
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until March 11, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

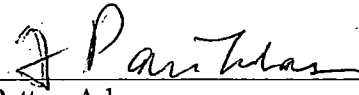


Laura R. Baer
Appellate Defender

Attorney for Appellant



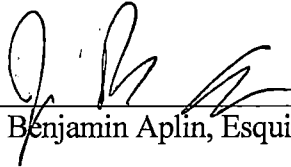
Robert M. Dudek
Chief Appellate Defender



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

This 10th day of February, 2016.

I consent:



J. Benjamin Aplin, Esquire