

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
Robin B. Stilwell, Circuit Court Judge

RECEIVED

FEB 26 2016

SC SUPREME COURT

IN THE MATTER OF THE CARE AND
TREATMENT OF JEFFREY ALLEN CHAPMAN,

APPELLANT

APPELLATE CASE NO. 2014-001181

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE INITIAL REPLY
BRIEF OF APPELLANT

Counsel for Jeffrey Allen Chapman respectfully requests an extension of ten (10) days in which to file the initial reply brief of appellant in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The initial reply brief of appellant are due to be served and filed with the Court today.
2. Counsel for Jeffrey Allen Chapman 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. Along with co-counsel Robert M. Dudek, counsel is currently working on the death penalty PCR case of Marion Lindsey v. State, which was remanded to the circuit court by the Supreme Court. Counsel filed petition for writ of certiorari and accompanying appendix in

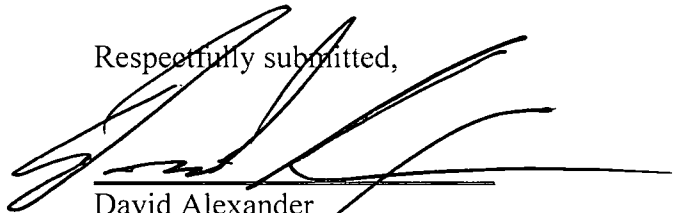
the case of Jeremy Wright v. State with the Supreme Court on February 17, 2016. Counsel is assisting in the preparation of the record on appeal in the death penalty case of State v. Ricky Blackwell. Counsel filed the brief of appellant and designation of matter in the case of State v. William Zeigler with the Court of Appeals on February 11, 2016. Counsel filed a petition for rehearing in the case of State v. Zinah Jennings with the Court of Appeals on February 10, 2016. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. James Johnson with the Supreme Court on January 29, 2016. Counsel filed the brief of appellant and designation of matter in the case of State v. Quentin Evans with the Court of Appeals on January 29, 2016. Counsel filed the reply brief of petitioner in the case of Brenda Gail Cutro v. State with the Supreme Court on January 21, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Edward Clarkson v. State with the Supreme Court on January 20, 2016. Counsel filed the brief of appellant and designation of matter in the case of State v. Alicia Adderly with the Court of Appeals on January 13, 2016. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. William Bolt with the Supreme Court on January 7, 2016. Counsel filed a return to petition for writ of certiorari in the case of State v. Brandon Garren with the Supreme Court on January 7, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kadrin Singleton with the Court of Appeals on January 6, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of William Whitfield v. State with the Supreme Court on January 6, 2016. Along with co-counsel Chief Appellate Defender Robert M. Dudek, on December 31, 2015, counsel filed the initial reply brief of appellant in the Supreme Court in the capital case of State v. Ricky Blackwell.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a ten (10) day extension, in which to file the initial reply brief of appellant in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Alexander', is written over a horizontal line. The signature is stylized and extends above and below the line.

David Alexander
Appellate Defender

Attorney for Appellant

February 26, 2016

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CERTIFICATE OF SERVICE

I certify that a true copy of the motion for an extension of time in which to file the initial reply brief of appellant in the above case has been served upon Deborah Shupe, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 26th day of February, 2016.



David Alexander
Appellate Defender

ATTORNEY FOR APPELLANT

SWORN TO BEFORE ME this 26th day
of February, 2016.

Varia Hendrick (L.S.)

Notary Public for South Carolina

My Commission Expires: July 3, 2023.