

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Appeal from Beaufort County
Maite Murphy, Circuit Court Judge

MAR 04 2016

SC Court of Appeals

STATE,

RESPONDENT,

V.

SHAYLA JEREAU BRYAN,

APPELLANT

APPELLATE CASE NO. 2014-001220

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 is on maternity leave as of February 8, 2016. On February 4, 2016, counsel filed a petition for rehearing in Frankie Lee Bryant v. State with this Court. On February 2, 2016, counsel filed the petition for writ of certiorari and accompanying appendix in Perry B. Buchanan v. State with the Supreme Court. On January 26, 2016, counsel filed the initial brief of appellant and designation of matter in State v. Kyndra Howell with this Court. On January 13, 2016, counsel filed the petition for writ of certiorari and accompanying appendix in Larry


Prophet v. State with the Supreme Court. On January 4, 2016, counsel had an oral argument in State v. Ryan P. Deleston before this Court. On December 29, 2015, counsel filed the petition for writ of certiorari and accompanying appendix in David Rocquemore v. State with the Supreme Court. On December 22, 2015, counsel filed the brief of petitioner in Elijah Baylock Jr. v. State with the Supreme Court.

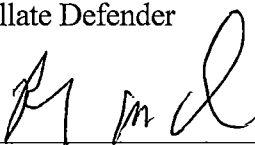
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. As indicated by the 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,


Lara M. Caudy
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

March 4th, 2016

I do not oppose:


J. Benjamin Aplin, Esquire