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Sign AFB due 3/17/16

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Florence County  
William H. Seals, Jr., Circuit Court Judge

RECEIVED

MAR 17 2016

SC Court of Appeals  
RESPONDENT,

STATE,

V.

CHRISTOPHER M. PETERSON,

APPELLANT

APPELLATE CASE NO. 2015-001359

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

Counsel for Christopher M. Peterson respectfully requests a **final thirty (30) day extension, until April 18, 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 fifth 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 four previous extensions.
2. Counsel for Christopher M. Peterson 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 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.

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.

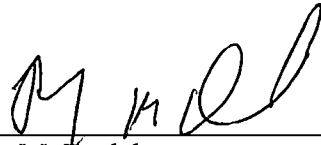
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until April 18, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

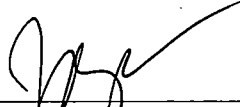
Respectfully submitted,

  
Lara M. Caudy  
Appellate Defender

Attorney for Appellant



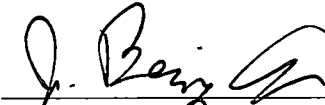
Robert M. Dudek  
Chief Appellate Defender



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

This 17<sup>th</sup> day of March, 2016.

I consent:

  
for Donald J. Zelenka, Esquire