

ORIGINAL

STATE OF SOUTH CAROLINA

In The Supreme Court

APPEAL FROM RICHLAND COUNTY

Alison Renee Lee, Circuit Court Judge

CITY OF COLUMBIA,

RESPONDENT,

V.

MARIE-THERESE ASSA'AD-FALTAS,

APPELLANT

APPELLATE CASE NO. 2015-000941

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

Counsel for appellant respectfully requests an extension of thirty (30) days, **until May 13, 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 third 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 two previous extensions.
2. Counsel for appellant respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously

RECEIVED

APR 19 2016

SC SUPREME COURT

granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

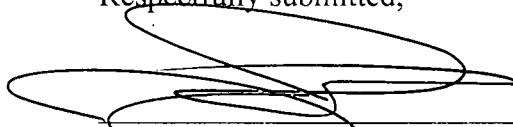
3. Counsel filed the consent motion to hold the appeal in abeyance and remand for resentencing in the case of The State v. Darrell Ervin Raines, Jr. with the Court of Appeals on April 7, 2016. Counsel filed the initial reply brief of appellant in the case of The State v. John Henry Lowery, II with the Court of Appeals on April 4, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin Brown v. The State of South Carolina in the Supreme Court on March 25, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Landon T. Sanders v. The State of South Carolina in the Supreme Court on March 23, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Staggs v. The State of South Carolina in the Supreme Court on March 21, 2016. Counsel filed the petition for petitioner's return to state's motion to dismiss or in alternative to remand the case to general sessions in the case of Donald Roberts v. The State of South Carolina in the Supreme Court on March 17, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Taquan Brown with the Court of Appeals on March 14, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Gary Fraley with the Court of Appeals on March 9, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Arthur Thomas with the Court of Appeals on March 3, 2016.

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

5. Counsel for the City of Columbia consents to this request shown by signature below.

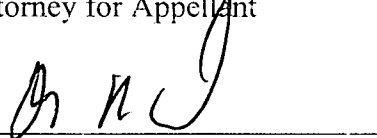
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, **until May 13, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



John H. Strom
Appellate Defender

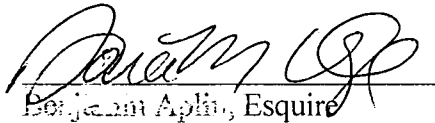
Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender

This 13th day of April, 2016.

I consent:


Benjamin Aplin, Esquire

Dana M. Thye,