

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Appeal from Richland County
Alison Renee Lee, Circuit Court Judge

RECEIVED

MAR 14 2016

CITY OF COLUMBIA,

SC SUPREME COURT

RESPONDENT,

V.

MARIE-THERESE ASSA'AD-FALTAS,

APPELLANT

APPELLATE CASE NO. 2015-000941

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF AND DESIGNATION
OF MATTER

The undersigned counsel respectfully requests a thirty day extension, **until April 13, 2016**, 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.

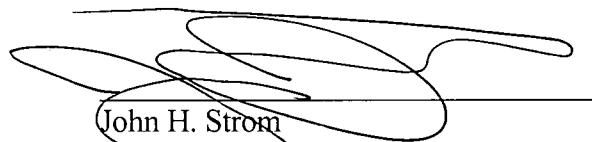
2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Gary Fraley with the Court of Appeals on March 9, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Arthur Thomas with

the Court of Appeals on March 3, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Junious v. The State of South Carolina in the Supreme Court on February 29, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Danny Cortez Brown v. The State of South Carolina in the Supreme Court on February 22, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Mejean with the Court of Appeals on February 16, 2016. Counsel had an oral argument in the case of The State v. O'neal Bernard Byrdic, Jr. in the Court of Appeals on February 9, 2016. Counsel filed the petition for rehearing in the case of The State v. James Clyde Dill with the Court of Appeals on January 28, 2016.

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.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



John H. Strom
Appellate Defender

March 14, 2016

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IN THE SUPREME COURT

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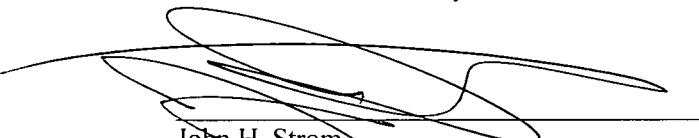
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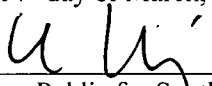
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to initial brief of appellant and designation of matter in the above referenced case has been served upon Mr. Patrick Carpenter Sharpe, Esquire, PO Box 667, Columbia, SC, 29202, this 14th day of March, 2016.


John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 14th day of March, 2016.



Notary Public for South Carolina
My Commission Expires: May 12th, 2025. (L.S.)