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4th AEB due 3/30/16

STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY

Frank R. Addy, Circuit Court Judge

ORIGINAL
RECEIVED

MAR 30 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

MORRIS RAY PETERS,

APPELLANT

APPELLATE CASE NO. 2015-001382

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

Counsel for appellant respectfully requests a **fourth and final** extension of thirty (30) days **until April 29th, 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 fourth 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 three 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 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 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. 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.

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.

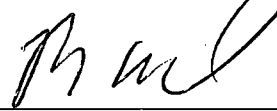
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until April 29th, 2016** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

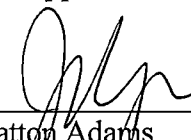


John H. Strom
Appellate Defender

Attorney for Appellant



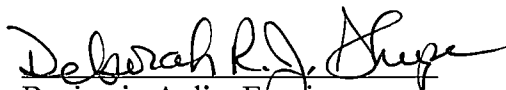
Robert M. Dudek
Chief Appellate Defender



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

This 30th day of March, 2016.

I consent:



Benjamin Aplin, Esquire