

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Greenwood County  
Edward W. Miller, Circuit Court Judge

THE STATE,

V.

JAMAL HAKEEM,

APPELLANT

APPELLATE CASE NO. 2015-001542

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

Counsel for Jamal Hakeem respectfully requests a **fourth and final** extension of thirty (30) days **until May 11, 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 Jamal Hakeem 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.

4th AFB due 4/11/16  
ORIGINAL

RECEIVED

APR 11 2016

RESPONDENT  
SC Court of Appeals

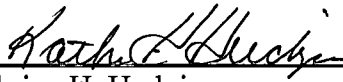
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon Heath Clark v. The State of South Carolina on April 6, 2016 with the Supreme Court. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Waymon Eugene Newton on March 30, 2016 with this Court. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Steven McElrath v. The State of South Carolina on March 18, 2016 with the Supreme Court. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Mickey Lane Mayberry v. The State of South Carolina on March 18, 2016 with the Supreme Court. Counsel filed a petition for rehearing in the case of Willis Weary v. The State of South Carolina on March 15, 2016 with this Court. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Michael Gentile on March 9, 2016 with this Court. Counsel filed a petition for rehearing in the case of The State v. Sammy Lee Scarborough on March 4, 2016 with this Court. Counsel filed a petition for rehearing in the case of Stephen Smalls v. The State on February 22, 2016, with this Court. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Marshall Dewitt McGaha v. The State on February 22, 2016, with the Supreme Court. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Gary R. Thompson on February 22, 2016, with the Supreme Court. Counsel filed the brief of petitioner in the case of Willie J. Adams v. The State on February 22, 2016 with the Supreme Court. Counsel filed the Initial Reply Brief in the case of State v. Preston Oates with this court on February 11, 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.

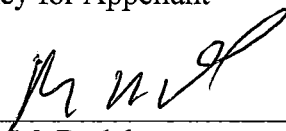
5. Counsel for the Attorney General's office consents to this request shown by signature below.

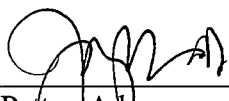
WHEREFORE, the undersigned counsel would respectfully request **a fourth and final thirty (30) day extension until May 11, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

  
\_\_\_\_\_  
Kathrine H. Hudgins  
Appellate Defender

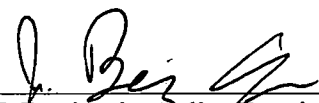
Attorney for Appellant

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

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

This 11<sup>th</sup> day of April, 2016.

I consent:

  
\_\_\_\_\_  
J. Benjamin Aplin, Esquire