

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County
Maite Murphy, Circuit Court Judge

RECEIVED

MAY 04 2016

SC CONFIDENTIAL
RESPONDENT OF Appeals

THE STATE,

V.

SHAYLA JEREAU BRYAN,

APPELLANT

APPELLATE CASE NO. 2014-001220

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

Counsel for Shayla Jereau Bryan respectfully requests a **final nine (9) day extension, 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 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. **Counsel understands that a fifth extension is strongly disfavored.**

2. Counsel for Shayla Jereau Bryan 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. **Counsel regrets having to request this extension and will make every effort to file the brief prior to the nine day deadline.**

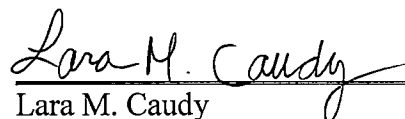
3. Counsel was on maternity leave from February 8, 2016 until May 2, 2016. On February 4, 2016, counsel filed a petition for rehearing in Frankie Lee Bryant v. State with this Court. On February 2, 2016, counsel filed the petition for writ of certiorari and accompanying appendix in Perry B. Buchanan v. State with the Supreme Court.

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.

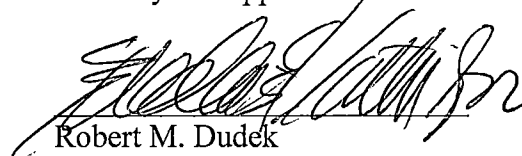
WHEREFORE, the undersigned counsel would respectfully request a **final nine (9) day extension until May 13, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

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 4th day of May, 2016.

I consent:



J. Benjamin Aplin, Esquire