

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County

Thomas A. Russo, Circuit Court Judge

RECEIVED

MAY 05 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

LANCE L. MILES,

APPELLANT

APPELLATE CASE NO. 2015-000308

PETITION FOR EXTENSION TO FILE
THE REPLY TO THE INITIAL BRIEF OF RESPONDENT

The undersigned counsel respectfully requests a **final ten-day extension, until May 16, 2016**, in which to file the reply to the initial brief of respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

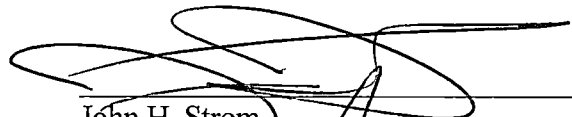
1. The reply to the initial brief of respondent is due to be served and filed today.
2. Counsel filed the motion to remand in the case of The State v. Joe Ross Worley with the Court of Appeals on May 4, 2016. Counsel filed *White v. State* brief of appellant in the case of Daniel Hamrick v. The State of South Carolina in the Supreme Court on May 2, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Daniel Hamrick v. The State of South Carolina in the Supreme Court on May 2, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tony Lee Belton v. The

State of South Carolina in the Supreme Court on April 28, 2016. Counsel filed the petition for rehearing in the case of The State v. Shawn Lee Wyatt with the Court of Appeals on April 20, 2016. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of James Clyde Dill v. The State of South Carolina in the Supreme Court on April 18, 2016. 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.

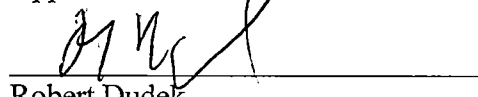
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final ten-day extension, until May 16, 2016**. Counsel respectfully requests that the time limits for filing the reply to the initial brief of respondent be held in abeyance pending a ruling on this motion.

Respectfully submitted,



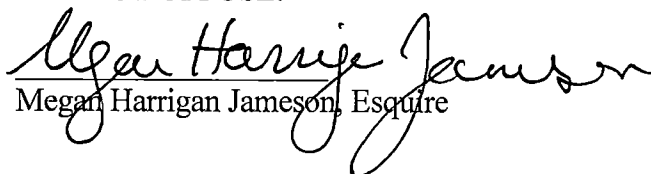
John H. Strom
Appellate Defender



Robert Dudek
Chief Appellate Defender

May 5, 2016

I DO NOT OPPOSE:



Megan Harrigan Jameson, Esquire