

4m AFB due 4/21/16

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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Colleton County
Thomas W. Cooper, Jr., Circuit Court Judge

RECEIVED

APR 29 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

ALBERT E. SIDERS,

APPELLANT

Appellate Case No. 2015-000995

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

Counsel for Albert E. Siders respectfully requests an extension of **final two (2) weeks, 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 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 Albert E. Siders 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.

3. Counsel filed the petition for writ of certiorari in the case of Ashley Eugene Moore v. State with the Supreme Court of the United States on April 26, 2016. Counsel filed the petition for writ of certiorari in the case of Robert Max Watkins v. State with the Supreme Court on April 20, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Marvin Brock Johnson with this Court on April 14, 2016. Counsel filed the reply to brief of respondent in the case of Didier Van Sellner v. State with the Supreme Court on April 6, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Justin Jermaine Johnson with this Court on April 4, 2016. Counsel filed the initial brief of appellant in the case of State v. David Glover with this Court on March 30, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Vanessa Laquetta Frayer with this Court on March 11, 2016. Counsel filed the petition for rehearing in the case of State v. Dennis M. Penny, II with this Court on March 3, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Travis Polite with this Court on March 2, 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 **two (2) weeks, 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.

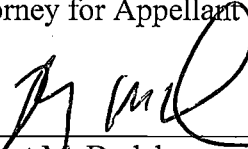
[Signatures on next page]

Respectfully submitted,

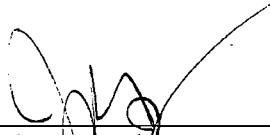


Laura R. Baer
Appellate Defender

Attorney for Appellant



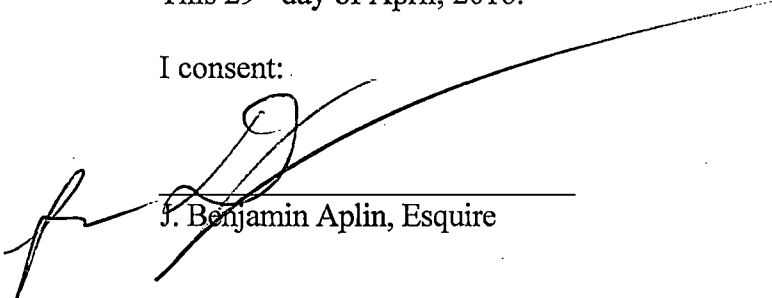
Robert M. Dudek
Chief Appellate Defender



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

This 29th day of April, 2016.

I consent:



J. Benjamin Aplin, Esquire