

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

4th
4-23-12
5-23-12
ORIGINAL

Appeal from Charleston County
Kristi L. Harrington, Circuit Court Judge

RECEIVED
APR 23 2012
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

LEONARD GOODWIN,

APPELLANT

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

Counsel for Leonard Goodwin respectfully requests an extension of thirty (30) days 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 Mr. Goodwin 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.

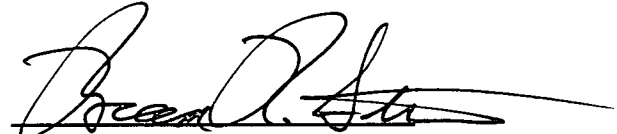
3. On April 20, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Chavis Pullen in this Court. On April 18, 2012, counsel filed the petition for writ of certiorari and appendix in the cases of Juan Ramos v State and Roger Legette v. State in the Supreme Court. On April 12, 2012, counsel filed the amended initial brief of appellant and designation of matter in the case of State v. Brandon Simmons in this Court and had an oral argument in the case of State v. Edward Twyman in this Court. On April 9, 2012, counsel filed the petition for writ of certiorari and appendix in the case of Dana Merritt v. State in the Supreme Court. On April 6, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Joseph Cobb in this Court. On April 4, 2012, counsel filed the petition for writ of certiorari and appendix in the case of Timothy Hester v. State in the Supreme Court. On March 26, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Samuel Dingle in this Court. On March 23, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Brandon Rogers in this Court. On March 19, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Bernaldino Ocasio in this Court. On March 16, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Watson in this Court. On March 12, 2012, counsel filed the petition for writ of certiorari and appendix in the case of Claude Jones v. State in the Supreme Court. On March 5, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Allen Capers and the brief of petitioner in the case of State v. Jason Black in the Supreme Court.

4. Counsel makes this request in good faith and not for purpose of delay.

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

WHEREFORE, the undersigned counsel would respectfully request an additional thirty (30) day extension in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Breen R. Stevens
Appellate Defender

Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender



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


This 23rd day of April, 2012.

I consent:



Donald J. Zelenka, Esquire

GRANTED
JOHN CANNON FEW, C.J.
FOR THE COURT

By: 
(Clerk) (Deputy Clerk)

FILED