

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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ORIGINAL

Appeal from Berkeley County  
Deadra L. Jefferson, Circuit Court Judge

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RECEIVED

STATE,

MAY 31 2016

RESPONDENT, SC Court of Appeals

V.

JERAMY PARKS,

APPELLANT

APPELLATE CASE NO. 2015-002050

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

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Counsel for Jeramy Parks respectfully requests a **fourth and final** extension of thirty (30) **until June 30, 2016**, 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 Jeramy Parks 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. Counsel filed the brief of appellant and designation of matter in the case of State v. Robert Wazney with the Court of Appeals on May 25, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Robert T., a Juvenile Under the Age of Seventeen with the Court of Appeals on May 20, 2016. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Jeffrey Chapman before the Supreme Court on May 17, 2016. Together with co-counsel Robert M. Dudek and Susan Hackett, counsel filed a petition for writ of certiorari in the case of State v. Brett Parker, in which the record exceeded 3,200 pages, with the Supreme Court on May 11, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jonathan Holder with the Court of Appeals on May 6, 2016. Counsel had an oral argument in the case of Jason Kinloch v. State before the Court of Appeals on May 2, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Joseph Cobb v. State with the Supreme Court on April 28, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of William Rice v. State with the Supreme Court on April 26, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Bobby Sims with the Court of Appeals on April 25, 2016. Counsel had an oral argument in the case of State v. Matthew Medley before the Court of Appeals on April 19, 2016. Along with co-counsel Chief Appellate Defender Robert M. Dudek, counsel had an oral argument in the death penalty case of State v. Ricky Blackwell before the Supreme Court on April 13, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gerald Williams with the Court of Appeals on April 6, 2016. Counsel filed a petition for rehearing in the case of State v. Gerald Barrett with the Court of Appeals on April 5, 2016. Counsel filed the initial reply brief in the case of In the Matter of the Care and Treatment of Daquan Johnson with the Supreme Court on March 31, 2016.

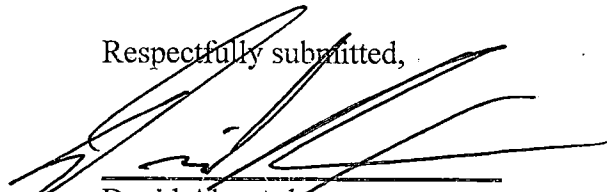
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

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.

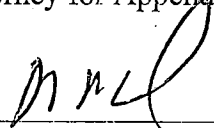
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **June 30, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



David Alexander  
Appellate Defender

Attorney for Appellant



Robert M. Dudek  
Chief Appellate Defender



J. Hugh Ryan, III  
General Counsel

This 31st day of May, 2016.

I consent:



Benjamin Aplin, Esquire