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ORIGINAL

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenwood County

Eugene C. Griffith, Jr., Circuit Court Judge

RECEIVED
JUN 23 2016
SC Court of Appeals

THE STATE,

APPELLANT,

v.

JOSIE JONES,

RESPONDENT

APPELLATE CASE NO. 2016-000273

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of respondent and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of respondent and designation of matter in this case are due to be served and filed today.
2. Counsel will file the return to the petition for writ of certiorari to the Court of Appeals in the case of State v. Mandy Lenore Smith with the Supreme Court today, June 22, 2016. Counsel filed the petition for writ of certiorari in the case of Timothy Young v. State with the Supreme Court on June 8, 2016. Counsel filed the petition for writ of certiorari in the case of Yorel Williams v. State with the Supreme Court on June 8, 2016. Counsel filed the petition for writ of certiorari in the case of Lorenzo D. Sullivan v. State with the Supreme Court on June 2,

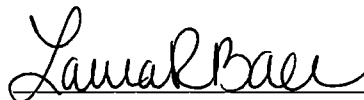
2016. Counsel filed the petition for writ of certiorari in the case of Marvin Bowens Green v. State with the Supreme Court on May 16, 2016. Counsel filed the initial brief of appellant in the case of State v. Albert E. Siders with this Court on May 13, 2016. Counsel filed the reply to return to re-petition for writ of certiorari in the case of Shannon McGee v. State with this Court on May 12, 2016. Counsel filed the petition for writ of certiorari in the case of DonSurvi Chisolm v. State with the Supreme Court on May 2, 2016. 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.

3. This request is made in good faith, and not for purposes of delay.

4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the initial brief of respondent and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

June 22, 2016

I DO NOT OPPOSE:



David Spencer, Esquire