

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Sumter County
William Jeffrey Young, Circuit Court Judge

RECEIVED

AUG 31 2016

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JEFFREY DANA ANDREWS,

APPELLANT

Appellate Case No. 2015-001679

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

Counsel for Jeffrey Dana Andrews respectfully requests an extension of thirty (30) days, **until September 30, 2016**, in which to file the Initial Brief of Appellant and Designation of Matter in this case. **Counsel will make every effort to file the brief in advance of the thirty (30) days.** This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. 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.
2. Counsel for Jeffrey Dana Andrews respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.
3. **Counsel has extensive administrative duties as the Chief Appellate Defender. Counsel is interviewing for an open Appellate Defender position, and also interviewing to**

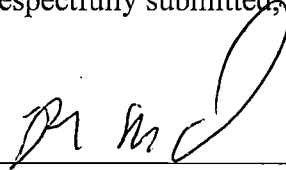
replace Lorie French who is retiring after thirty-seven (37) years. Counsel also has administrative and Appellate Project oversight, and, training four new appellate defenders, and reading all of their filings in advance. On August 8, 2016, counsel filed the brief of petitioner in the death penalty case of Marion Bowman v. State with the Supreme Court. On July 26, 2016, counsel filed the initial brief of appellant in the case of State v. Devarous S.L. Parks with this Court. On July 18, 2016 counsel filed the petition for writ of certiorari in the case of Melody Holmes v State with the Supreme Court. On July 8, 2016, counsel filed the initial brief of appellant in the case of State v. Walter Scott Garrett with this Court. Counsel also has three oral arguments to prepare for next week in the cases of: State v. Raheem D. King, on Wednesday, September 7, 2016 in the Supreme Court; State v. Shannon Scott, on Thursday, September 8, 2016 in this Court; State v. Joshua Griffith, on Thursday, September 8, 2016 in this Court. In addition, counsel is presenting at the Magistrate's Intensive Training in Myrtle Beach on Friday, September 9, 2016.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel is working first on cases that have been extended three times in an effort to make his caseload more manageable and reduce the number of extensions in the future.

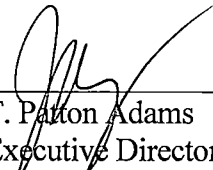
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, **until September 30, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. **Counsel will make every effort to file the brief in advance of the thirty (30) days.** Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



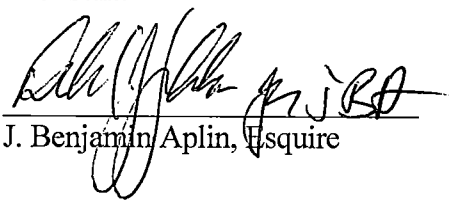
Robert M. Dudek
Chief Appellate Defender



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

This 31st day of August, 2016.

I consent:



J. Benjamin Aplin, Esquire