

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Chester County
Brian M. Gibbons, Circuit Court Judge

ORIGINAL

STATE,

RECEIVED

RESPONDENT
SEP 06 2016

SC Court of Appeals

v.

JASON SCOTT MORTON,

APPELLANT

APPELLATE CASE NO. 2015-002641

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

Counsel for Jason Scott Morton respectfully requests a **fourth and final** extension of thirty (30) **until October 6, 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 Jason Scott Morton 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.

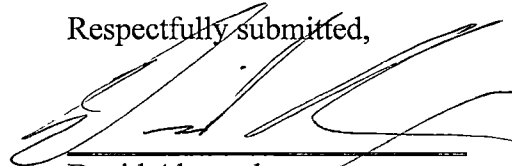
3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jeramy Parks with the Court of Appeals on August 24, 2016. Counsel filed the reply brief of petitioner in the case of Randall S. Tyler v. State in the Supreme Court on August 18, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Filiberto Campos with the Court of Appeals on August 17, 2016. Counsel filed a petition for rehearing in the case of Darrell L. Goss v. State with the Court of Appeals on August 10, 2016. Along with co-counsel Chief Appellate Defender Robert M. Dudek, counsel filed the brief of petitioner in the death penalty case of Marion Bowman v. State with the Supreme Court on August 8, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Juan Smith with the Court of Appeals on August 8, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Heyward Truesdale v. State with the Supreme Court on August 5, 2016. Counsel filed the Anders brief of appellant and Record on Appeal in the case of State v. Christopher Allen Middleton with the Court of Appeals on August 4, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Daniel Lee Lard with the Court of Appeals on July 13, 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.

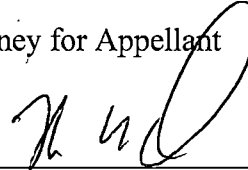
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **October 6, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

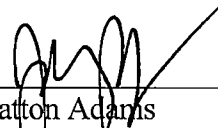


David Alexander
Appellate Defender

Attorney for Appellant



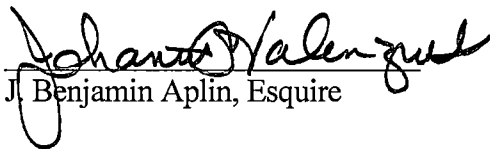
Robert M. Dudek
Chief Appellate Defender



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

This 6th day of October, 2016.

I consent:

for 
J. Benjamin Aplin, Esquire