

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Richland County
Robert E. Hood, Circuit Court Judge

ORIGINAL

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SEP 16 2016

RESPONDENT SC Court of Appeals

THE STATE,

V.

HOLLY JO THOMPSON,

APPELLANT

APPELLATE CASE NO. 2016-000340

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

Counsel for Holly Jo Thompson respectfully requests a **fourth and final** extension of thirty (30) days, **until October 16, 2016**, 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.
2. Counsel for Holly Jo Thompson 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 her caseload, counsel hopes that no further extension requests will be required.

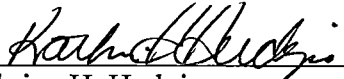
3. Counsel filed the petition for writ of certiorari and the accompanying appendix Tommie L. Pixley v. The State of South Carolina in the Supreme Court on September 12, 2016. Counsel filed the Johnson petition for writ of certiorari and the accompanying appendix in the case of Oblin Banegas Maldonado v. The State of South Carolina in the Supreme Court on September 9, 2016. Counsel filed the reply to return to petition for writ of certiorari in the case of Clark D. Thomas v. The State of South Carolina in the Supreme Court on September 8, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roosevelt Anthony Reaves v. The State of South Carolina in the Supreme Court on September 7, 2016. Counsel filed a motion in opposition in the case of Willis Weary v. The State of South Carolina on September 2, 2016, in the Supreme Court. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eddie A. Huggins v. The State of South Carolina in the Supreme Court August 23, 2016. Counsel filed the initial brief of appellant in the case of The State v. Isaac Romell Williams August 19, 2016 with this court. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Henry Davis v. The State of South Carolina in the Supreme Court August 12, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Austin McQuarters on August 10, 2016 with this court.

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.

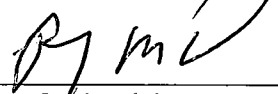
5. Counsel for the Attorney General's office consents to this request shown by signature below.

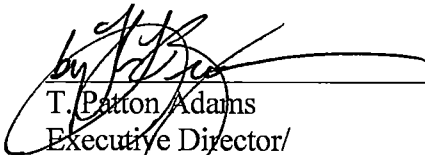
WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension, **until October 16, 2016**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,


Kathrine H. Hudgins
Appellate Defender

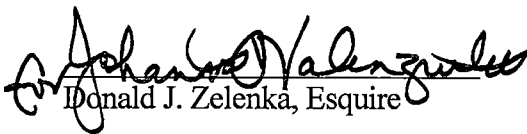
Attorney for Appellant


Robert M. Dudek
Chief Appellate Defender


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

This 16th day of September, 2016.

I consent:


Donald J. Zelenka, Esquire