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3rd AFB due 11/9/16

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County
Honorable G. Thomas Cooper, Circuit Court Judge

RECEIVED

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SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JAMES BUBBA PATTERSON,

APPELLANT

Appellate Case No. 2016-000863

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

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of appellant 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 appellant and designation of matter in this case are due to be served and filed today.
2. Counsel filed the Johnson Petition for Writ of Certiorari and the accompanying appendix in the case of LeArthur Hills v. The State of South Carolina on October 31, 2016 with the Supreme Court. Counsel filed Initial Brief of Appellant in the case of The State of South Carolina v. Emmanuel Elleby with this Court on November 4, 2016. Counsel filed the Initial Brief of Appellant in the case of The State of South Carolina v. Nathaniel Wright with this Court on October 25, 2016. Counsel filed the Initial Brief of Appellant in the case of The State of South Carolina v. Holly Jo Thompson with this Court on October 17, 2016. Counsel filed the



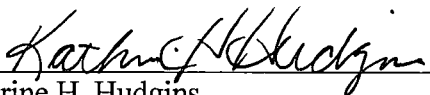
Reply Brief of Petitioner in the case of The State of South Carolina v. Maurice Odom with this Court on October 17, 2016. Counsel filed the Johnson Petition for Writ of Certiorari and the accompanying appendix in the case of Gregory Pencille v. The State of South Carolina with the Supreme Court on October 14, 2016. Counsel filed the Initial Brief of Appellant in the case of The State of South Carolina v. Holly Jo Thompson with this Court on October 17, 2016. Counsel filed the Anders Brief of Appellant, Designation of Matter, and Record on Appeal in the case of The State v. Rasheed T. Glover in the Court of Appeals on October 10, 2016. Counsel filed the Johnson Petition for Writ of Certiorari and the accompanying appendix in the case of Johnny James Edwards, Jr v. The State of South Carolina with the Supreme Court on September 30, 2016. Counsel filed the Anders Brief of Appellant and record on appeal in the case of The State of South Carolina v. Randy Glenn with this Court on September 28, 2016. Counsel filed the Petition for Writ of Certiorari and the accompanying appendix in the case of The State of South Carolina v. William Anthony Wallace with this Court to the Supreme Court on September 19, 2016. Counsel filed the Petition for Writ of Certiorari and the accompanying appendix in the case of The State of South Carolina v. Marco Sanders with this Court to the Supreme Court on September 19, 2016. Counsel filed the Petition for Writ of Certiorari and the accompanying appendix in the case of Darryl Frierson v. The State of South Carolina with this Court to the Supreme Court on September 19, 2016.

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

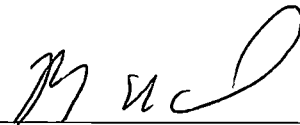
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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

Respectfully submitted,




Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

November 9, 2016

I DO NOT OPPOSE?



Benjamin A. Aplin, Esquire