

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Berkeley County
Honorable Ralph F. Cothran, Circuit Court Judge

RECEIVED

JAN 09 2017

SC Court of Appeals

IN THE MATTER OF THE CARE AND
TREATMENT OF MICHAEL KAMINSKI,

APPELLANT

APPELLATE CASE NO. 2016-000606

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

Counsel for Michael Kaminski respectfully requests a **fourth and final** extension of thirty (30) **until February 8, 2017**, 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 Michael Kaminski 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.

J

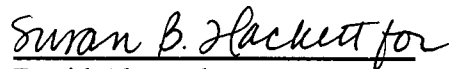
3. Counsel filed the brief of petitioner in the case of State v. James Allen Johnson with the Supreme Court on January 3, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Jason Bodie with this Court on December 28, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Cleveland Edward Young with this Court on December 16, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Brandon Hunter Kenny Rivers with this Court on December 16, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Maurice Marshall Harris with this Court on December 13, 2016. Counsel filed the return to petition for writ of certiorari in the case of State v. Jimmy Turner with the Supreme Court on December 8, 2016. Counsel had an oral argument in the case of State v. Tyrone D. Ellison before this Court on December 7, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew Dwyer with this Court on December 2, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Billy Ray Smith with this Court on November 28, 2016. Counsel filed a petition for rehearing in the case of State v. James Kevin Bethal with this Court on November 23, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Terry Catoe with this Court on November 16, 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 Leonard Jenkins with this Court on November 16, 2016. Counsel filed the petition for writ of certiorari in the case of Vashawn Ravenel v. State with the Supreme Court on November 14, 2016. Counsel filed the petition for writ of certiorari in the case of Darrell L. Goss v. State with the Supreme Court on November 14, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. King Chevais Conyers with this Court on November 9, 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 February 8, 2017**, 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 9th day of January, 2017.

I consent:


for Deborah R.J. Shupe, Esquire