

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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ORIGINAL

Appeal from Charleston County  
G. Thomas Cooper, Circuit Court Judge

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RECEIVED

JAN 23 2017

ALONDA B. DESAUSSURE,

PETITIONER  
S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000137

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE BRIEF OF PETITIONER AND APPENDIX

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Counsel for Alonda B. Desaussure respectfully requests a **final fifteen (15) day extension, until February 7, 2017**, in which to file the Brief of Petitioner and additional copies of the Appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The brief of petitioner and additional copies of the appendix are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Alonda B. Desaussure 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. Counsel will work diligently in an effort to file the brief of petitioner and additional copies of the appendix prior to the deadline requested herein.

3. Counsel filed the petition for writ of certiorari in the case of Boyd Rashaen Evans v. State with this Court on January 20, 2017. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Calvin Terrell Williams with the Court of Appeals on January 18, 2017. Counsel filed the initial reply brief of appellant in the case of State v. Dean Distasio with the Court of Appeals on January 12, 2017. Counsel filed the initial brief of appellant in the case of State v. Preston Mozeak with the Court of Appeals on January 11, 2017. Counsel filed the initial brief of appellant in the case of State v. Richard A. Capell with the Court of Appeals on January 9, 2017. Counsel filed the initial brief of appellant in the case of State v. John Calvin Sledge with the Court of Appeals on January 9, 2017. Counsel filed the Johnson petition for writ of certiorari in the case of Leonard B. Goodwin v. State with this Court on January 3, 2017. Counsel filed the initial brief of appellant in the case of State v. Antwan Adams with the Court of Appeals on December 21, 2016. Counsel filed the petition for writ of certiorari in the case of James William McKinney, Jr. v. State with the Court of Appeals on December 16, 2016.

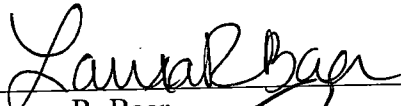
4. Counsel makes this request in good faith and not for purpose of delay.

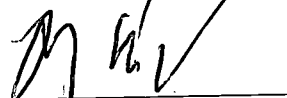
5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

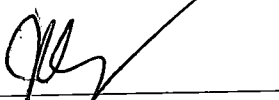
WHEREFORE, the undersigned counsel would respectfully request a **final fifteen (15) day extension, until February 7, 2017**, in which to file the Brief of Petitioner and additional copies of the Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief and appendix be held in abeyance pending a ruling on this motion.

This 23rd day of January, 2017.

Respectfully submitted,

  
\_\_\_\_\_  
Laura R. Baer  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

  
\_\_\_\_\_  
T. Patton Adams  
Executive Director/  
J. Hugh Ryan, III  
General Counsel/  
W. Lawrence Brown  
Deputy General Counsel

I consent:

  
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for Alicia Olive, Esquire