

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Greenville County

RECEIVED

Honorable Perry H. Gravely, Circuit Court Judge

JAN 27 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

MARSELL HILL,

APPELLANT

APPELLATE CASE NO. 2016-000868

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

Counsel for Marshall Hill respectfully requests an extension of **final thirty (30) days, until February 27, 2017** 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 Marshall Hill respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions

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previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

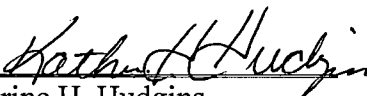
3. Counsel filed the Petition for Rehearing in the case of The State of South Carolina v. Demetrice Roosevelt James in the Court of Appeals on January 24, 2017. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Christopher Wells with this Court on January 18, 2017. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Charles Winston, Jr. with this Court on January 17, 2017. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals in the case of Shanna Kranchick v. The State of South Carolina with the Supreme Court on January 11, 2017. Counsel filed the Initial Brief of Appellant in the case of The State of South Carolina v. James Bubba Patterson with this Court on January 9, 2017. Counsel filed the Brief of Petitioner in the case of Jason Sanford v. The State of South Carolina with the Supreme Court on January 3, 2017. Counsel filed the Brief of Appellant in the case of The State v. Lester Mosley, Jr. with this Court on December 19, 2016. Counsel filed the Initial Brief of Appellant in the case of The State of South Carolina v. Jermaine D. Grier with this Court on December 16, 2016. Counsel filed the Johnson Petition for Writ of Certiorari and the accompanying appendix in the case of Marion Stewart v. The State of South Carolina with the Supreme Court on December 12, 2016. Counsel filed the Johnson Petition for Writ of Certiorari and the accompanying appendix in the case of Travarias Walker v. The State of South Carolina with the Supreme Court on December 6, 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 his signature below.

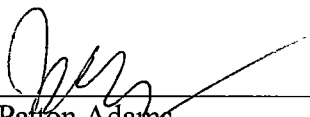
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until February 27, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

  
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Kathrine H. Hudgins  
Appellate Defender

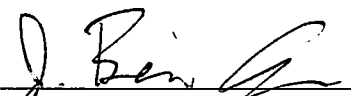
Attorney for Appellant

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

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

This 27<sup>th</sup> day of January, 2017

I consent:

  
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Benjamin Aplin, Esquire