

4th AP's due 1/30/17

6

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Spartanburg County

Honorable R. Keith Kelly, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

RECEIVED

JAN 30 2017

CATHY DAWN SKATES,

APPELLANT

SC Court of Appeals

APPELLATE CASE NO 2016-001552

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

Counsel for appellant respectfully requests a **fourth and final** extension of thirty (30) days **until March 1, 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 appellant 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Frank Middleton v. State of South Carolina with the Supreme Court on January 27, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Joseph Manners with the Court of Appeals on January 18, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Tinsley v. State of South Carolina with the Supreme Court on January 11, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Terry Cooper with the Court of Appeals on January 6, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William Cannon Gresham v. State of South Carolina with the Supreme Court on December 28, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gregory Quinn Gathers v. State of South Carolina with the Supreme Court on December 21, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ronald Lance v. State of South Carolina with the Supreme Court on December 16, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darius Green v. State of South Carolina with the Supreme Court on December 16, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Mario Shivers v. State of South Carolina with the Supreme Court on December 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.

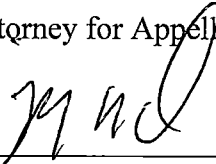
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until March 1, 2017** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

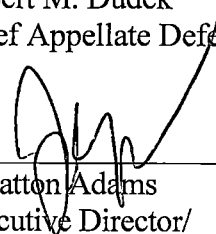


Taylor D. Gilliam
Appellate Defender

Attorney for Appellant



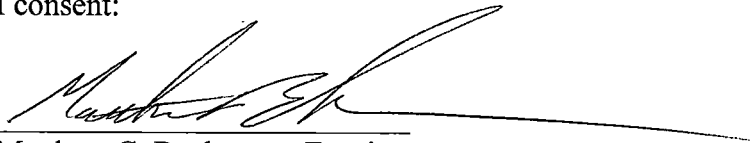
Robert M. Dudek
Chief Appellate Defender



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

This 30th day of January, 2017.

I consent:



Matthew C. Buchanan,, Esquire