

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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ORIGINAL

Appeal from Richland County  
Frank Addy Jr., Circuit Court Judge

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THE STATE,

RECEIVED

APPELLANT, FEB 13 2017

v.

SC Court of Appeals

RAHEEM AQUIL,

RESPONDENT.

APPELLATE CASE NO. 2016-002029

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

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Counsel for appellant respectfully requests a **fourth and final** extension of thirty (30) days **until March 15, 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 to the Court of Appeals and accompanying appendix in the case of Donte Samar Brown v. The State of South Carolina in the Supreme Court on February 9, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of DeAngelo Mitchell v. The State of South Carolina in the Supreme Court on February 6, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Maurice Wilson v. The State of South Carolina in the Supreme Court on February 6, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Theia Darion McArdle with the Court of Appeals on January 27, 2017. Counsel filed the petition for rehearing in the case of The State v. John Henry Lowery with the Court of Appeals on January 26, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Sara Elizabeth Hodson with the Court of Appeals on January 24, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Antonia Spratt v. The State of South Carolina in the Supreme Court on January 20, 2017. Counsel filed the petition for certiorari to the Court of Appeals in the case of The State v. Daniel Martinez Herrera with the Supreme Court on January 19, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyris B. Glover v. The State of South Carolina in the Supreme Court on January 12, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Hassan Tyler, with the Court of Appeals on December 16, 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.

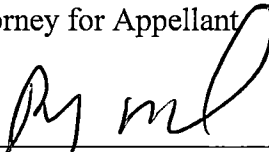
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until March 15, 2017** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



John H. Strom  
Appellate Defender

Attorney for Appellant



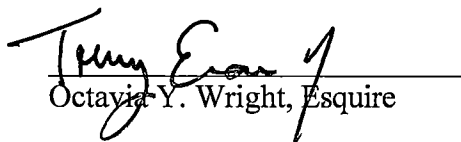
Robert M. Dudek  
Chief Appellate Defender



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

This 13<sup>th</sup> day of February, 2017.

I consent:



Octavia Y. Wright, Esquire