

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Newberry County  
Donald B. Hocker, Circuit Court Judge

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ORIGINAL

RECEIVED

MAR 13 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

CARROL TREMAYNE WASHINGTON,

APPELLANT

APPELLATE CASE NO. 2016-000792

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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 Carrol Tremayne Washington respectfully requests a **fourth and final** extension of thirty (30) days **until April 12, 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 Carrol Tremayne Washington 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.

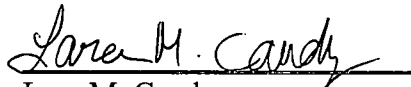
3. On March 10, 2017, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Q. Tindal v. The State with the Supreme Court. On March 9, 2017, counsel, along with co-counsel, Robert M. Dudek, filed the reply brief of petitioner in the case of The State v. Ryan P. Deleston with the Supreme Court. On March 8, 2017, counsel had an oral argument in the case of In the Matter of the Care and Treatment of Carl M. Asquith before this Court. On February 27, 2017, counsel filed the petition for writ of certiorari and accompanying appendix in Sammy Wiggins v. The State with the Supreme Court. On February 21, 2017, counsel filed the initial brief of appellant and designation of matter in The State v. Brittany Shaunta Pearson with this Court. On February 16, 2017, counsel filed the petition for writ of certiorari and accompanying appendix in Matthew J. Eargle v. The State with the Supreme Court. On February 10, 2017, counsel filed the petition for writ of certiorari and accompanying appendix in Brice Di'Von Coley v. The State with the Supreme Court. On February 8, 2017, counsel filed the petition for writ of certiorari and accompanying appendix in William Gregg v. The State with the Supreme Court. On January 30, 2017, counsel filed the initial brief of appellant and designation of matter in The State v. Jonathan Donell Rhodes with this Court. On January 27, 2017, counsel filed the initial brief of appellant and designation of matter in The State v. Steven Dwayne Moses with this Court. On January 18, 2017, counsel filed the initial brief of appellant and designation of matter in The State v. Kevin Alston with this Court. On January 9, 2017, counsel filed the petition for writ of certiorari and the accompanying appendix in Carols J. Kemp v. The State with the Supreme Court.

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.

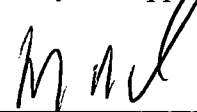
5. Counsel for the Attorney General's office consents to this request shown by signature below.

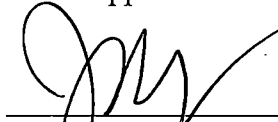
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **April 12, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
Lara M. Caudy  
Appellate Defender


Attorney for Appellant

  
Robert M. Dudek  
Chief Appellate Defender

  
J. Hugh Ryan, III  
Executive Director/  
Hervery B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown  
Deputy General Counsel and Training  
Director

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

I consent:

  
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J. Benjamin Aplin, Esquire