

4th AFB due 3/15/17

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ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Greenville County  
Honorable James R. Barber, Circuit Court Judge

RECEIVED

MAR 15 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

GERALD AKEEM GADSDEN,

APPELLANT

APPELLATE CASE NO. 2016-001286

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

Counsel for Gerald Akeem Gadsden respectfully requests a **fourth and final** extension of thirty (30) **until April 14, 2017**, days 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 Gerald Akeem Gadsden respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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number of extensions 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 had an oral argument in the case State v. Gerald R. Williams before this Court on March 14, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case Jason Shane Lawson v. State with the Supreme Court on March 8, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon A. Davis v. State with the Supreme Court on March 7, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Billy Lemurces Taylor with this Court on February 27, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Antwon Fuller with this Court on February 27, 2017. Counsel filed the petition for writ of certiorari in the case of Terrell Addison v. State with the Supreme Court on February 27, 2017. Counsel filed the petition for writ of certiorari in the case of Charlie G. Wood v. State with the Supreme Court on February 17, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Michael Kaminski with this Court on February 8, 2017. Counsel filed the petition for writ of certiorari in the case of State v. James K. Bethel with the Supreme Court on February 6, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joshua B. Phillips v. State with the Supreme Court on February 1, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Adrian Jenkins with this Court on January 27, 2017. Counsel filed the petition for rehearing in the case of In The Matter and the Care of Daryl T. Snow with this Court on January 26, 2017. Counsel filed the initial brief of respondent and designation of matter in the case of State v. John Kenneth Massey, Jr. with this Court on January 26, 2017. Counsel filed the petition for writ of certiorari in the case of Shaquan Thompson v. State with the Supreme Court on January 19, 2017.

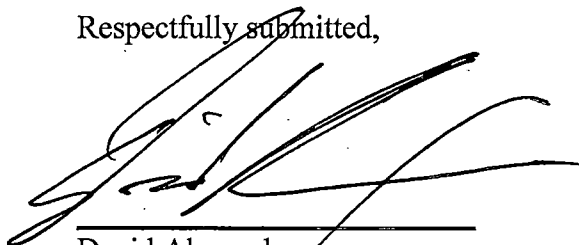
Counsel filed the petition for writ of certiorari in the case of State v. Corey Jamal Williams with the Supreme Court on January 18, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Cheo D. Green with this Court on January 17, 2017.

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.

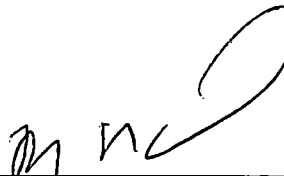
WHEREFORE, the undersigned counsel would respectfully request **a fourth and final thirty (30) day extension** until **April 14, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

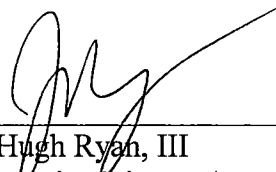


David Alexander  
Appellate Defender

Attorney for Appellant



Robert M. Dudek  
Chief Appellate Defender

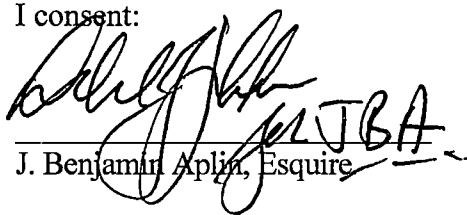


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J. Hugh Ryan, III  
Executive Director/  
Hervey B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown  
Deputy General Counsel and Training  
Director

This 15th day of March, 2017.

I consent:



J. Benjamin Aplin, Esquire