

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Richland County

Honorable Letitia H. Verdin, Circuit Court Judge

RECEIVED

APR 07 2017

THE STATE,

RESPONDENT

SC Court of Appeals

v.

JANOBLIN MAURICE BRACY-BROWN,

APPELLANT

APPELLATE CASE NO 2016-001513

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 May 8, 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 Matthew Frazier v. State of South Carolina with the Supreme Court on March 23, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jarvis Hughes with the Court of Appeals on March 15, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Stapleton v. State of South Carolina with the Supreme Court on March 13, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dean Henry Cole v. State of South Carolina with the Supreme Court on March 10, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Cathy Dawn Skates with the Court of Appeals on March 1, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Calvin Brown with the Court of Appeals on February 27, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Chuck Edward McCullough v. State of South Carolina with the Supreme Court on February 21, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Arturo Rios Torres with the Court of Appeals on February 16, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Timothy Emmanuel Greene with the Court of Appeals on February 8, 2017. 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.

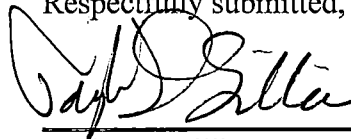
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

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.

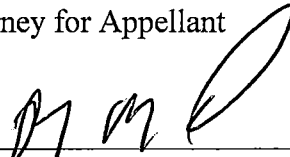
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until May 8, 2017** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

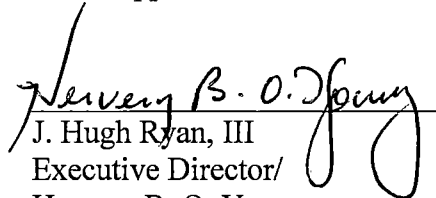


Taylor D. Gilliam
Appellate Defender

Attorney for Appellant



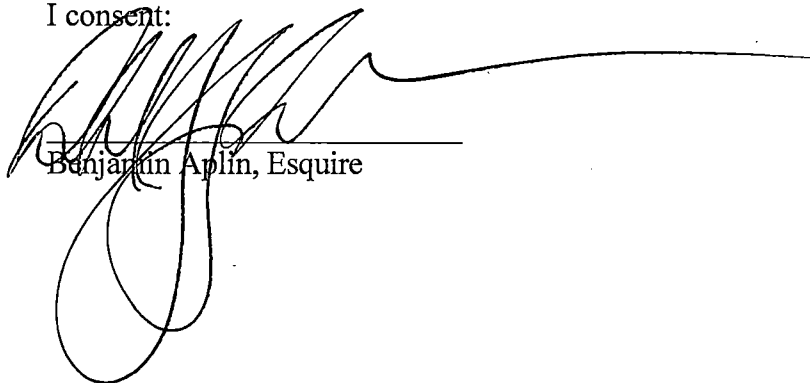
Robert M. Dudek
Chief Appellate Defender



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 7th day of April, 2017.

I consent:



Benjamin Aplin, Esquire