

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

 ORIGINAL

Appeal from Dorchester County
Honorable Diane S. Goodstein, Circuit Court Judge

IN THE MATTER OF THE CARE AND
TREATMENT OF FRANK SAUNDERS,

RECEIVED

APR 19 2017

APPELLANT SC Court of Appeals

APPELLATE CASE NO. 2016-002005

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

Counsel for Frank Saunders respectfully requests a **fourth and final** extension of thirty (30) **until May 19, 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 Frank Saunders 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel had an oral argument in the case of State v. Lorenzo Young on April 17, 2017, before this Court. Counsel also was second chair in the **death penalty case** of Marion Bowman v. State which was argued on April 13, 2017, at the Supreme Court by the Chief

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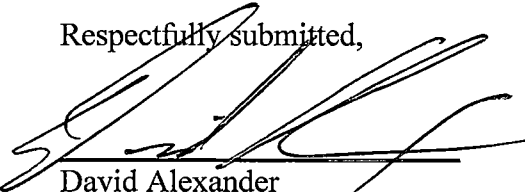
Appellate Defender and counsel was heavily involved in the preparation for that argument. Counsel had an oral argument in the case of State v. James Allen Johnson before the Supreme Court on April 13, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Lee Dell Bradley with this Court on March 31, 2017. Counsel filed the Petition for Writ of Certiorari in the case Joseph Pettigrew Sanders , IV, v. State with the Supreme Court on March 20, 2017. 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.

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.

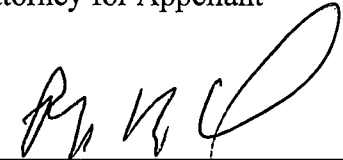
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **May 19, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

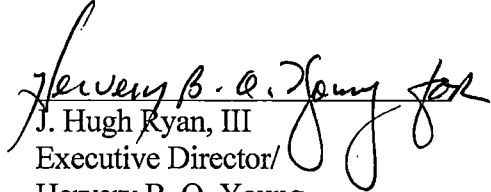


David Alexander
Appellate Defender

Attorney for Appellant




Robert M. Dudek
Chief Appellate Defender



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 19th day of April, 2017.

I consent:



for Deborah R.J. Shupe, Esquire