

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County

Deadra L. Jefferson, Circuit Court Judge

RECEIVED

APR 19 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

VALENTINO M. HAYWARD,

APPELLANT

APPELLATE CASE NO. 2015-002663

**PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER**

The undersigned counsel would respectfully request a **final thirty-day extension until May 19, 2017** in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today having been extended by three prior orders of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Tompai v. State in the Supreme Court today, April 19, 2017. Counsel argued in

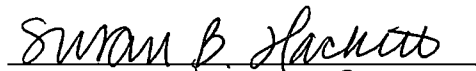
the case of State v. Marvin Brown in this Court on April 18, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Melvin Durant in this Court on April 11, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Mykel Johnson v. State in the Supreme Court on April 6, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Carrie Callaham v. State in the Supreme Court on March 30, 2017. Counsel filed the Anders brief of appellant and Record on Appeal in the case of State v. Mark Allen Bradberry in this Court on March 29, 2017. Counsel filed the return to petition for writ of certiorari to this Court in the case of State v. Devin Johnson in the Supreme Court on March 28, 2017. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Wayne Gary Polite in the Supreme Court on March 27, 2017. Counsel filed the initial reply brief of appellant and designation of matter in the case of State v. John Kenneth Massey in this Court on March 16, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix and the brief pursuant to White v. State in the case of William McCladdie v. State in the Supreme Court on March 13, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Evans v. State in the Supreme Court on March 8, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert D. Smith in this Court on March 6, 2017. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Abdul Furquan in the Supreme Court on February 27, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jake Lake in this Court on February 27, 2017. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Keith Denver Tate in the Supreme Court on February 21, 2017.

3. This request is made in good faith, and not for purposes of delay.

4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension until May 19, 2017** in which to file the initial brief of appellant and designation of matter in this case. Counsel 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.

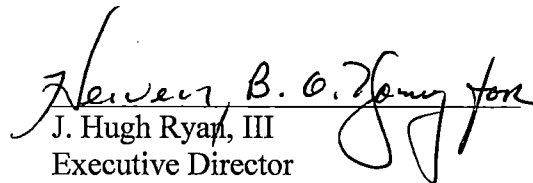
Respectfully submitted,



Susan B. Hackett
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

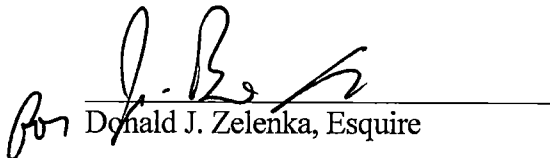


J. Hugh Ryan, III
Executive Director

Hervery B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training Director

April 19, 2017

I DO NOT OPPOSE:



Donald J. Zelenka, Esquire