

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Richland County  
Robert E. Hood, Circuit Court Judge

RECEIVED

APR 28 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

EDWARD PRIMO BONILLA,

APPELLANT

Appellate Case No. 2016-001725

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

The undersigned counsel respectfully requests a thirty day extension 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 extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.

2. *Counsel is working on preserving the record for appeal exercises and a power point on Rules of Evidence Issues and Error Preservation for the three day Public Defender 103 training from May 1-3, 2017, in Greenville, South Carolina where he serves on the faculty.* Counsel is preparing to file the initial brief of appellant and designation of matter in the case The State v. Arsenio D. Colclough with this Court today, April 28, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Allen Rauch v. The State with the Supreme Court on Monday, April 24, 2017. On April 17, 2017, counsel filed the petition for writ of certiorari

and accompanying appendix in the case of The State v. Jalann Williams with the Supreme Court. On April 13, 2017, counsel had an oral argument in the case of Marion Bowman v. The State before the Supreme Court. On April 12, 2017, counsel had an oral argument in the case of The State v. Sandy Lynn Westmoreland before this Court. On April 7, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tyrone Quick with this Court. On April 7, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Teresa Ann McCracken-Hall with this Court. On April 4, 2017, counsel, was co-counsel to, Laura M. Baer, when they filed the initial brief of appellant and designation of matter in the case of The State v. Robert Graham with this Court. On March 31, 2017, counsel filed the reply in support of petition for a writ of certiorari in the case of Bryan Rearick v. State with the U.S. Supreme Court. On March 30, 2017, counsel filed the petition for rehearing in the case of State v. Joshua Griffith with this Court. On March 22, 2017, counsel had an oral argument in the case of The State v. Harold Bennon Cartwright, III, before the Supreme Court. On March 20, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Stanley Miller with this Court. On March 15, 2017, counsel filed the initial brief of appellant and designation of matter in the SVP case of In the Matter of the Care and Treatment of John Henry Dorsey with this Court. On March 10, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. John M. Ghent, Jr. with this Court. On March 9, 2017, counsel, along with co-counsel, Lara M. Caudy, filed the reply brief of petitioner in the case of The State v. Ryan P. Deleston with the Supreme Court. On February 28, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tyrone Malcolm Benn with this Court. On February 24, 2017, counsel presented at the 26<sup>th</sup> Annual Criminal Law Seminar. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training two less**

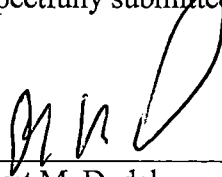
**experienced appellate defenders, and screening for interviews for an Appellate Defender position, and recently making a hire for an assistant's position.**

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

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

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. 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,

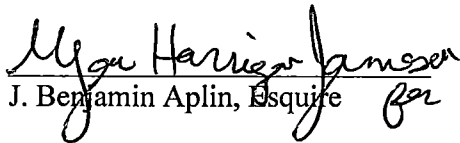


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Robert M. Dudek  
Chief Appellate Defender

April 28, 2017

I DO NOT OPPOSE:



J. Benjamin Aplin, Esquire *for*