

 ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County

Honorable Roger M. Young, Circuit Court Judge

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THE STATE,

**RECEIVED**

JUN 23 2017

SC Court of Appeals

RESPONDENT,

V.

RECO RAMONE FELDER,

APPELLANT

APPELLATE CASE NO. 2016-002483

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

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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 filed the initial brief of appellant and designation of matter in the case of State v. Curtis Tyrone Williams with the Court of Appeals today, June 23, 2017. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Isaac Starke v. State with the Supreme Court on June 16, 2017. Counsel filed the initial brief of appellant and



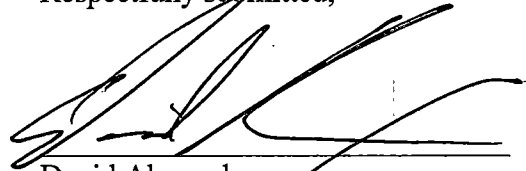
designation of matter in the case of State v. Aaron Van Hendrix with this Court on June 15, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robin Renee Herndon with this Court on June 14, 2017. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Rodney Ladson v. State with the Supreme Court on May 30, 2017. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Vincent Missouri v. State with the Supreme Court on May 26, 2017. On May 22, 2017, counsel traveled to Horry County to appear as a witness pursuant to a subpoena in a PCR action. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Frank Saunders with this Court on May 19, 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 David A. Ward with this Court on May 19, 2017. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of In the Matter of the Care and Treatment of Daryl T. Snow with the Supreme Court on May 16, 2017. Counsel filed the brief of respondent in the case of State v. Brandon Garren with the Supreme Court on May 11, 2017. Counsel filed the brief of petitioner in the case of State v. Gerald Barrett with the Supreme Court on May 4, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gerald Gadsden with this Court on April 24, 2017. Counsel had an oral argument in the case of State v. Lorenzo Young on April 17, 2017, before this Court.

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

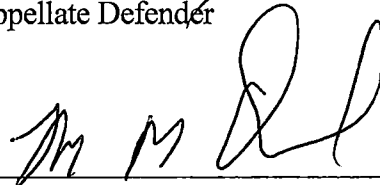
4. As indicated by the consent below, counsel for the state graciously consents to or does not oppose this request.

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,



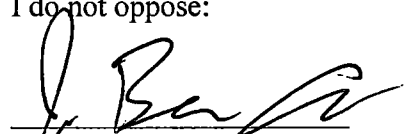
David Alexander  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 23rd day of June, 2017

I do not oppose:

  
J. Benjamin Aplin, Esquire