

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Georgetown County
Honorable D. Craig Brown, Circuit Court Judge

RECEIVED

JUL 03 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

STANLEY DELANOR MOULTRIE,

APPELLANT

APPELLATE CASE NO. 2016-001830

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

Counsel for Stanley Delanor Moultrie respectfully requests an extension of a **final thirty (30) days, until August 2, 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 Stanley Delanor Moultrie 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 her caseload, counsel hopes that no further extension requests will be required.

3. Counsel will file the petition for writ of certiorari in Ortavious Mitchell v. State with the Supreme Court today, July 3, 2017. Counsel filed the petition for writ of certiorari to the Court of Appeals in In the matter of the care and treatment of Calvin Joe Miller with the Supreme Court on June 29, 2017. Counsel filed the initial brief of appellant in State v. Auston Breazeal with this Court on June 23, 2017. Counsel had oral argument in the case of State v. Desmond Green with this Court on June 21, 2017. Counsel filed the petition for writ of certiorari in Thomas Geddie v. State with the Supreme Court on June 8, 2017. Counsel filed the initial brief of appellant in State v. Anthony M. Enriquez with this court on June 7, 2017. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in State v. Stephon Robinson with the Supreme Court on May 24, 2017. Counsel filed the Johnson petition for writ of certiorari in the case of Darrin Graham v. State with the Supreme Court on May 24, 2017. Counsel filed the petition for writ of certiorari in Kevin Casey v. State with the Supreme Court on May 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.

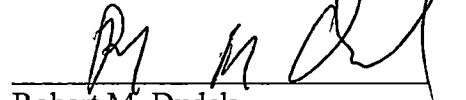
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until August 2, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

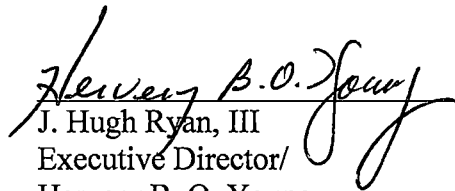


Laura R. Baer
Appellate Defender

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 3rd day of July, 2017.

I consent:



J. Benjamin Aplin, Esquire