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6th AEB due 7/12/17

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Spartanburg County

Honorable R. Keith Kelly, Circuit Court Judge

RECEIVED

JUL 12 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

KASEY MARIE GILBERT,

APPELLANT

Appellate Case No. 2016-002139

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

Counsel for Kasey Marie Gilbert respectfully requests a **final exigent four day extension, until Tuesday, July 18, 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. 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.
2. Counsel for Kasey Marie Gilbert 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 has been working extensively on the case of The State v. Kayla Wright which has involved four trips to Greenwood, South Carolina, including a trip today July 12, 2017, to consult on important legal collateral matters involved in that case.** Counsel has dictated the brief of appellant pursuant to White v. State in the case of Shonta Helton v. The State and is preparing the petition for writ of certiorari in that case filing in the Supreme Court on Friday, July 14, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Joshua Griffith from this Court with the Supreme Court on July 5, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tekysha Cohen with this Court on June 30, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jayquan Wilmore with this Court on June 29, 2017. Counsel filed the return to motion to stay the scheduling of a petition and return until consideration and ruling on petitioner's Rule 243(C), SCACR explanation in the death penalty case of Brad Keith Sigmon v. The State with the Supreme Court on June 23, 2017. Counsel filed the petition for stay of execution in the death penalty case of The State v. Ricky Lee Blackwell with the Supreme Court on June 15, 2017. Counsel filed the motion to unseal the briefs and the record on appeal in the death penalty case of The State v. Ricky Lee Blackwell with the Supreme Court on June 15, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jacob Michael Hendricks with this Court on June 14, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of: Dillon H., a Juvenile Under the Age of Seventeen with this Court on June 5, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Antonio Ross with this Court on May

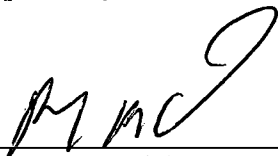
26, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tashon Earl Hurrell with this Court on May 19, 2017. Counsel filed the petition for rehearing in the case of The State v. Shannon Scott with this Court on May 18, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Calvert Myers with the Supreme Court on May 16, 2017. Counsel filed the initial brief of appellant and designation of matter in the murder case of The State v. Royres Antwon Patterson with this Court on May 12, 2017. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight.**

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 Probation, Pardon and Parole Services consents to this request shown by signature below.

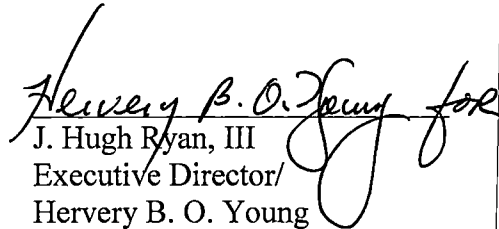
WHEREFORE, the undersigned counsel would respectfully request a final four (4) day exigent extension **until Tuesday, July 18, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. **Counsel will file the brief before that Tuesday deadline if at all possible.** Counsel requests that the time limits in this case also be held in abeyance pending a ruling on that motion.

Respectfully submitted,



Robert M. Dudek  
Chief Appellate Defender


Attorney for Appellant



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 12th day of July, 2017.

I consent:



Matthew Buchanan, Esquire