

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Greenville County

Honorable Edward W. Miller, Circuit Court Judge

RECEIVED

JUL 19 2017

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JACOBY JAMAR GREGORY,

APPELLANT

APPELLATE CASE NO. 2016-001533

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

Counsel for Jacoby Jamar Gregory respectfully requests an extension of a **final thirty (30) days, until August 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. 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 Jacoby Jamar Gregory 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 filed the petition for writ of certiorari in Samuel Brown, Jr. v. State with the Supreme Court on July 13, 2017. Counsel filed the petition for writ of certiorari in Ortavious Mitchell v. State with the Supreme Court on 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.

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.

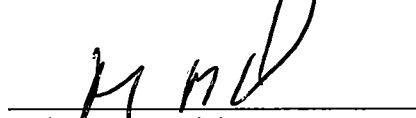
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until August 18, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

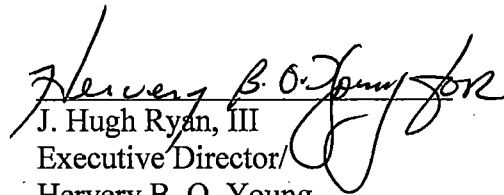


Laura R. Baer
Appellate Defender

Attorney for Appellant



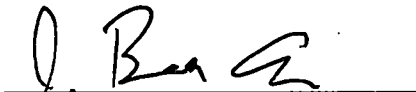
Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and
Training Director

This 19th day of July, 2017.

I consent:


Donald J. Zelenka, Esquire