

 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

**RECEIVED**

STATE,

JUL 24 2017

RESPONDENT, **SC Court of Appeals**

V.

RECO RAMONE FELDER,

APPELLANT


APPELLATE CASE NO. 2016-002483

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

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Counsel for Reco Ramone Felder respectfully requests a **fourth and final** extension of thirty (30) days **until August 23, 2017**, days 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 Reco Ramone Felder 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.
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3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Larry Heyward with this Court on July 7, 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 Herman Lee Archie with this Court on July 6, 2017. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Albert J. Cave v. State with the Supreme Court on June 27, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Curtis Tyrone Williams with this Court on 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.

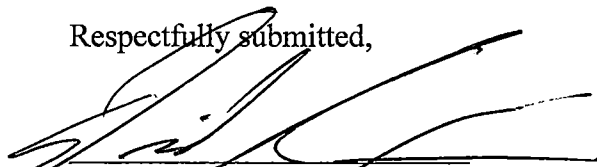
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

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 fourth and final thirty (30) day extension** until **August 23, 2017**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

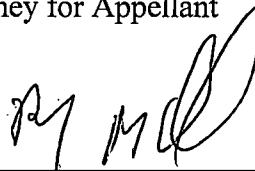
Respectfully submitted,



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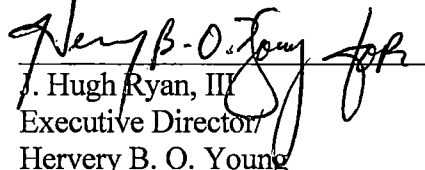
David Alexander  
Appellate Defender

Attorney for Appellant



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Robert M. Dudek  
Chief Appellate Defender




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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 24th day of July, 2017.

I consent:



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J. Benjamin Arlin, Esquire