

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Roger L. Couch, Circuit Court Judge

RECEIVED  
OCT 30 2017  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

MACK SEAL WASHINGTON,

APPELLANT

APPELLATE CASE NO. 2017-001111

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

The undersigned counsel would respectfully request a **final thirty-day extension until November 29, 2017** 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 exigent circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today having been extended by three prior orders of this Court.
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gregory Brooks in this Court on October 23, 2017. Counsel filed the petition for writ of



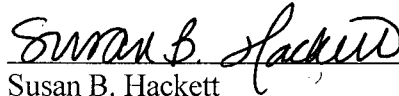
certiorari pursuant to Austin v. State and accompanying appendix in the case of Isaias Gutierrez v. State in the Supreme Court on October 23, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Isaias Gutierrez v. State in the Supreme Court on October 23, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Marcus Channing Johnson in this Court on October 13, 2017. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Shane Adam Burdette in the Supreme Court on October 6, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of George Smith v. State in the Supreme Court on October 2, 2017. Counsel presented at a CLE entitled “Annual Fall Seminar” sponsored by the Lexington County Bar Association in Lexington, S.C. on October 4, 2017. Counsel presented at a CLE entitled “Post-Conviction Relief Representation: Don’t Mangle Your Case” sponsored by SCCID in Columbia, S.C. on September 29, 2017. Counsel attended the 2017 Annual Public Defender Conference from September 25 through September 27, 2017 in Myrtle Beach, S.C. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Bennie Ray Brown, Jr. in the Supreme Court on September 22, 2017. Counsel filed the brief of petitioner in the case of State v. Christopher D. Campbell in the Supreme Court on September 18, 2017. Counsel filed the petition for writ of certiorari to this Court in the case of State v. Dennis E. Cervantes-Pavon in the Supreme Court on September 15, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Scott Simmons in this Court on September 14, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kadeem Johnson v. State in the Supreme Court on September 5, 2017. Counsel filed the initial brief of respondent and designation of matter in the case of State v. Jamie Simpson in this Court on August 30, 2017.

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

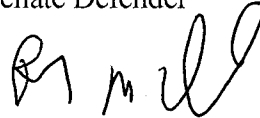
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension until November 29, 2017** in which to file the initial brief of appellant and designation of matter in this case. Counsel 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.

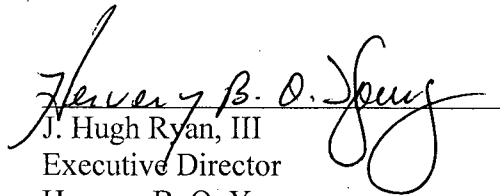
Respectfully submitted,



Susan B. Hackett  
Appellate Defender



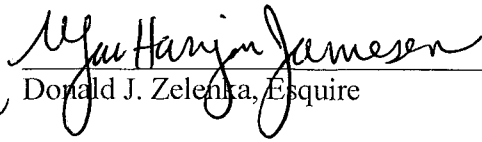
Robert M. Dudek  
Chief Appellate Defender



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

October 30, 2017

I DO NOT OPPOSE:



Donald J. Zelenka, Esquire