

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Aiken County

Honorable R. Lawton McIntosh, Circuit Court Judge

THE STATE,

RECEIVED

MAR 09 2018
RESPONDENT,
SC Court of Appeals

v.

KELVIN JONES,

APPELLANT

APPELLATE CASE NO. 2016-001835

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

Counsel for Kelvin Jones respectfully requests an extension of a **final thirty (30) days, until April 9, 2018**, 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 Kelvin Jones 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 Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Vance Ross with the Court of Appeals on March 7, 2018. Counsel filed the Johnson Petition for Writ of Certiorari and accompanying appendix in the case of Ralph Beverly Hayes v. The State of South Carolina with the Supreme Court on February 26, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Robert Matthew Fulmer v. The State of South Carolina with the Supreme Court on February 26, 2018. Counsel filed the Anders Brief of Appellant pursuant to White v. State in the case of Robert Matthew Fulmer v. The State of South Carolina with the Supreme Court on February 26, 2018. Counsel filed the Petition for Writ of Certiorari to the Court of Appeals and accompanying appendix in the case of The State of South Carolina v. Christopher Jermaine Wells with the Supreme Court on February 20, 2018. Counsel filed the Anders Brief of Appellant and Designation of Matter in the case of In The Matter of the Care and Treatment of Justin L. Stewart, Appellant with the Court of Appeals on February 15, 2018. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Heyward Legree Martin with the Court of Appeals on February 13, 2018. Counsel filed the Brief of Petitioner in the case of The State of South Carolina v. Michael Gentile with the Court of Appeals on February 12, 2018. Counsel filed the Anders Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Terrance Lamar Tyson with the Court of Appeals on February 5, 2018. Counsel filed the Anders Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Timothy Adam Hester, Sr. with the Court of Appeals on February 1, 2018. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Johnathan Green with the Court of Appeals on January 19, 2018. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in

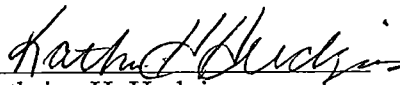
the case of Albert James Cave v. The State of South Carolina with the Supreme Court on January 12, 2018. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Adrian Vashard Simmons with the Court of Appeals on January 8, 2018.

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.

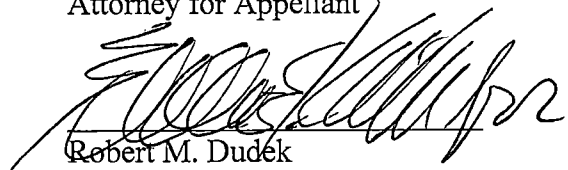
5. Counsel for the Attorney General's office consents to this request shown by signature below.

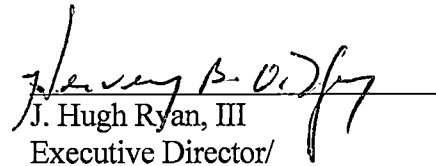
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until April 9, 2018**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,


Kathrine H. Hudgins
Appellate Defender

Attorney for Appellant

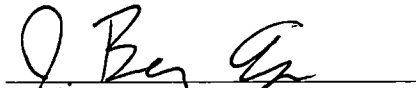

Robert M. Dudek
Chief Appellate Defender



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 9th day of March, 2018.

I consent:


J. Benjamin Aplin, Esquire