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4th AFD file 3/19/18

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Chester County
Honorable Paul M. Burch, Circuit Court Judge

RECEIVED
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SC Court of Appeals

STATE,

RESPONDENT,

V.

JERMAINE MARQUEL BELL,

APPELLANT

APPELLATE CASE NO. 2017-001500

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

Counsel for Jermaine Marquel Bell respectfully requests a **fourth and final** extension of thirty (30) days **until April 18, 2018**, 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 Jermaine Marquel Bell respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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 filed the Petition for Writ of Certiorari in the case of Kenneth Jowan Craig v. State with the Supreme Court on March 19, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. David Richard Walker, Jr. with this Court on March 19, 2018. Counsel filed the Petition for Rehearing in the case of State v. Gerald R. Williams with this Court on March 13, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Arthur Ray Chavis v. State with the Supreme Court on February 26, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Marco Andre Clark v. State with the Supreme Court on February 23, 2018. Counsel filed the Return to Petition for Writ of Certiorari in the case of Vladimir W. Pantovich v. State with the Supreme Court on February 18, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Tarl Bradford Rollings with this Court on February 16, 2018. Counsel filed the Brief of Petitioner in the case of In the Matter of the Care and Treatment of Daryl T. Snow with the Supreme Court on February 12, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Henry James Ross, Jr. v. State with the Supreme Court on February 8, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of State v. Vincent Missouri with the Supreme Court on February 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jaycoby Terreak Williams with this Court on January 30, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. John Anthony Singleton with this Court on January 25, 2018. Counsel filed the initial brief of appellant and designation of matter in the

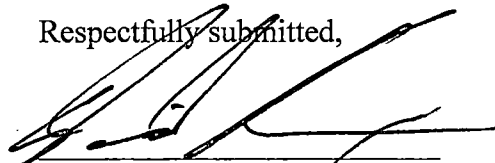
case of State v. Michael Anthony Bodison with this Court on January 22, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Christopher Busch with this Court on January 17, 2018. Counsel filed the initial brief of respondent and designation of matter in the case of In the Matter of the Care and Treatment of Gerald Barrett with this Court on January 17, 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.

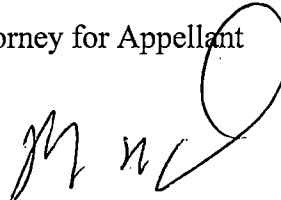
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **April 18, 2018**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

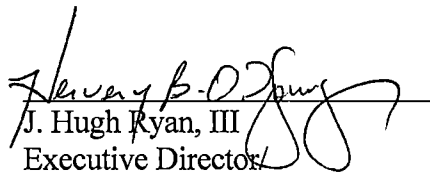


David Alexander
Appellate Defender

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 19th day of March, 2018.

I consent:


for Donald J. Zelenka, Esquire