

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

THE STATE,

v.

TAPPIA DANGELO GREEN,

ORIGINAL
RECEIVED
MAR 30 2018
SC Court of Appeals
RESPONDENT,

APPELLANT

APPELLATE CASE NO. 2017-001296

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

The undersigned counsel respectfully requests a thirty-day extension 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 extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.

2. Counsel is currently preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari in the cases of Toshonda Mickens v. The State, Darrell Heyward v. The State, and Kelvin Jackson v. The State which she plans to file with the Supreme Court in the upcoming weeks. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of William Andrew Lee v. The State with the Supreme Court

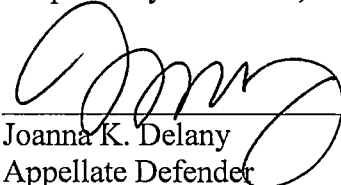
on March 29, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Bryan Ellis with this Court on March 14, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Eugene Hardy with this Court on February 14, 2018.

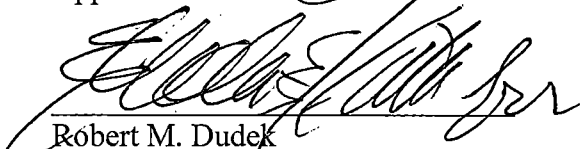
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension. Counsel respectfully 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.

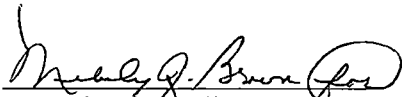
Respectfully submitted,


Joanna K. Delany
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

This 30th day of March 2018.

I do not oppose:


J. Benjamin Aplin, Esquire