

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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ORIGINAL

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

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THE STATE,

RESPONDENT,

V.

TAPPIA DANGELO GREEN,

APPELLANT

APPELLATE CASE NO. 2017-001296

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RECEIVED

APR 30 2018

SC COURT OF APPEALS

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 Tappia Dangelo Green, respectfully requests a **fourth and final thirty (30) day extension, until May 30, 2018**, in which to file the initial brief of appellant and designation of matter in the above-referenced case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for Tappia Dangelo Green, 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 is consulting and preparing with Chief Appellate Defender, Robert M. Dudek, on the initial brief of appellant and designation of matter in the case of The State v. Jon Smart which she plans to file Friday, May 4, 2018. Counsel is also preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari in the cases of Kelvin Jackson v. The State and Laurie Hollis 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 Toshonda Mickens v. The State with the Supreme Court on April 9, 2018. Counsel filed the petition for writ of certiorari and the accompanying appendix in the case of Darrell Heyward v. The State with the Supreme Court on April 4, 2018. 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 the Court of Appeals on March 14, 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.

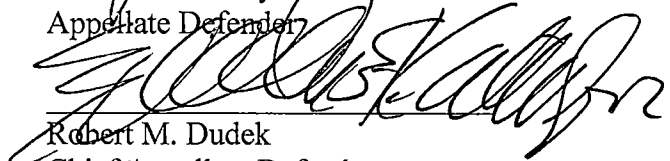
5. Counsel for the Attorney General's office consents to this request shown by signature below.

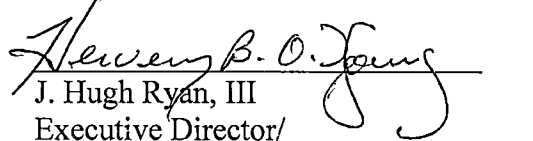
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension until May 30, 2018**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests

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,

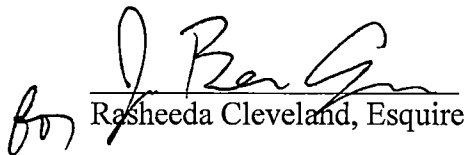
  
Joanna K. Delany  
Appellate Defender

  
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 30th day of April, 2018.

I do not oppose:

  
Rasheeda Cleveland, Esquire