

3rd AFB June 6/22/18  
ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Lexington County  
Eugene C. Griffith, Circuit Court Judge  
\_\_\_\_\_

RECEIVED  
JUN 22 2018  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JOHN CHRISTOPHER HART,

APPELLANT

APPELLATE CASE NO. 2017-001291  
\_\_\_\_\_

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 preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari in the cases of Eric Wright v. The State and Chavis Aikman 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 Leonard Jenkins v. The State with the Supreme Court on June 18, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Dominique Cash v. The State with the Supreme Court on June 13, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Laurie Hollis v. The State with the Supreme Court on June 6, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Kelvin Jackson v. The State with the Supreme Court on June 4, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tappia Green with this Court on May 30, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jon Smart with this Court on May 4, 2018.

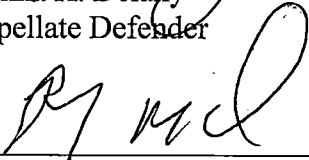
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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.

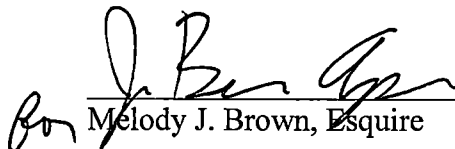
Respectfully submitted,

  
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Joanna K. Delany  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 22nd day of June, 2018.

I do not oppose:

  
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Melody J. Brown, Esquire