

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from York County  
Honorable Daniel D. Hall, Circuit Court Judge  
\_\_\_\_\_

RECEIVED  
SEP 17 2018  
SC Court of Appeals

THE STATE,

APPELLANT,

V.

BRUCE STANLEY JONES,

RESPONDENT

APPELLATE CASE NO. 2018-000224  
\_\_\_\_\_

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

Counsel for Bruce Stanley Jones respectfully requests a **fourth and final** extension of thirty (30) days **until October 17, 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. 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 Bruce Stanley 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 his caseload, counsel hopes that no further extension requests will be required.

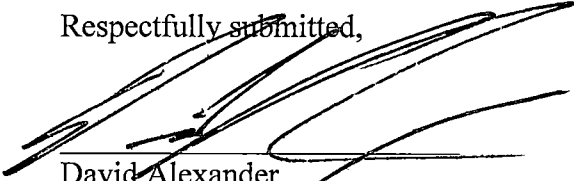
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Conrad Antonio Allen v. The State with the Supreme Court on August 31, 2018. Counsel filed the petition for rehearing in the case of The State v. Michael Juan Smith with this Court on August 30, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Joshua Flowers with this Court on August 28, 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 Robbie Collins with this Court on August 22, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Courtney Price with this Court on August 2, 2018. Counsel filed the brief of petitioner in the case of Isaac Starke v. The State with the Supreme Court on August 1, 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 Gary Lee Burris with this Court on July 31, 2018. On July 26, 2018, counsel spoke at the Orientation School for Magistrate and Municipal Judges. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Calvin Brown, Jr. with the Supreme Court on July 25, 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 **October 17, 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 time limits for filing the brief be held in abeyance pending a ruling on this motion.

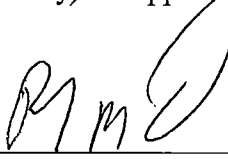
Respectfully submitted,



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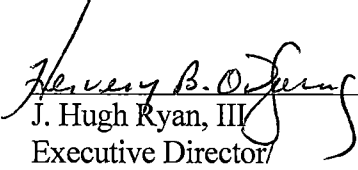
David Alexander  
Appellate Defender

Attorney for Appellant



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Robert M. Dudek  
Chief Appellate Defender



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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 17th day of September, 2018.

I consent:



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J. Benjamin Aplin, Esquire