

4th AFB due 10/1/18

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Berkeley County
Honorable D. Craig Brown, Circuit Court Judge

ORIGINAL

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SC Court of Appeals

RESPONDENT,

THE STATE,

V.

CHRISTOPHER GREENE, III,

APPELLANT

APPELLATE CASE NO. 2018-000189

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

Counsel for Christopher Greene, III, respectfully requests a **fourth and final thirty (30) day extension, until October 31, 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 Christopher Green, III, 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 her caseload, counsel hopes that no further extension requests will be required.

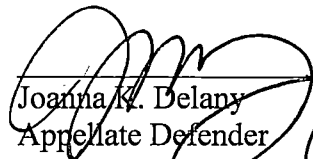
3. On September 24 – 26, 2018, counsel attended the Public Defender Convention in Myrtle Beach, South Carolina. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny Lee Paden v. The State with this Court on September 17, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Wilton Q. Greene v. The State with the Supreme Court on August 29, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Christopher Hart 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. Randy Wright with this Court on August 22, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Anthony B. Lay v. The State with the Supreme Court on August 15, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Cole Brooks Gray with this Court on August 10, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Marty Baggett v. The State with the Supreme Court on August 6, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey Michaelson v. The State with the Supreme Court on July 30, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Steven Randall Cobb v. The State with the Supreme Court on July 23, 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.

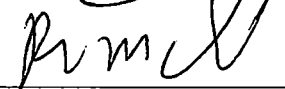
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension until October 31, 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.

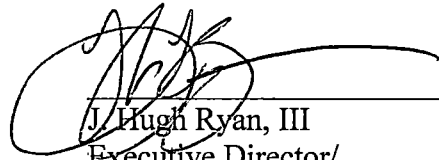
Respectfully submitted,



Joanna K. Delany
Appellate Defender



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 1st day of October, 2018.

I do not oppose:



J. Benjamin Aplin, Esquire