

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Beaufort County

Honorable Brooks P. Goldsmith, Circuit Court Judge

RECEIVED  
OCT 29 2018  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JUSTIN PAUL ADAMS,

APPELLANT

APPELLATE CASE NO. 2017-001018

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

Counsel for Justin Paul Adams respectfully requests a **final twenty-five (25) day extension, until November 23, 2018**, 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 four previous extensions.
2. Counsel for Justin Paul Adams respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. **This sexual abuse case for which appellant received a twenty-five year sentence contains numerous**

**complex legal issues, some of which appear to be novel in South Carolina. Counsel is still working through his own cases, in addition to new cases assigned due to the recent departure of two appellate defenders.** 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 brief of petitioner in the case of Antrell Rashawn Felder v. The State with the Supreme Court on October 24, 2018. Counsel filed the initial brief of respondent and designation of matter in the case of The State v. Bruce Stanley Jones with this Court on October 19, 2018. Counsel had an oral argument in the case of The State v. Jimmy Turner before the Supreme Court on October 17, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kenneth Collins with this Court on October 9, 2018. Counsel had an oral argument in the case of The State v. Robin Herndon with this Court on October 9, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Leon Barksdale with this Court on October 8, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis Napoleon Davis v. The State with the Supreme Court on October 8, 2018. Counsel attended the state Public Defender Convention in Myrtle Beach, South Carolina on September 24, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Keiron Coleman v. The State with the Supreme Court on September 21, 2018. Counsel had an oral argument in the case of The State v. Corey J. Williams with the Supreme Court on September 19, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jose Cabarruvias v. The State with the Supreme Court on September 17, 2018. 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.

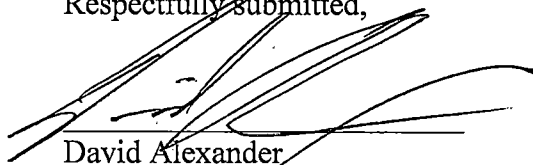
Counsel filed the petition for rehearing in the case of The State v. Michael Juan Smith with this Court on August 30, 2018.

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 **final twenty-five (25) day extension until November 23, 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.

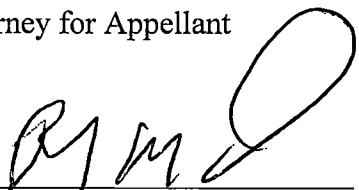
Respectfully submitted,



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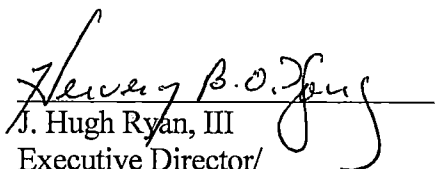
David Alexander  
Appellate Defender

Attorney for Appellant



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Robert M. Dudek  
Chief Appellate Defender




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

This 29th day of October, 2018.

I consent:



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J. Benjamin Aplin, Esquire