

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of General Sessions

Perry H. Gravely, Circuit Judge

Appellate Case No. 2017-002539

**RECEIVED**

NOV 13 2018

SC Court of Appeals

The State,.....Respondent,

v.

John Michael Hughes.....Appellant.

MOTION FOR ONE WEEK EXTENSION OF TIME TO SERVE AND FILE  
APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

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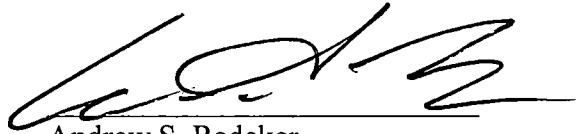
Appellant hereby moves pursuant to Rule 263(b), SCACR, for a one-week extension of the time in which to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension and that there are extraordinary circumstances that support the granting of an extension, as the following shows:

1. The deadline for service and filing of Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal is today, November 13, 2018.
2. Andrew S. Radeker, the attorney primarily handling this appeal, is a private practitioner who was appointed to represent the Appellant in this case through the appellate project continuing legal education pro bono program coordinated with the Office of Appellate Defense.
3. Counsel is working on finishing this brief and has nearly finished the brief. An unexpected child care situation regarding counsel's children has arisen, however, that will make it unlikely that counsel can finish the brief today.
4. This constitutes an extraordinary circumstance warranting an extension.
5. Counsel seeks only a week's extension and sees no reason why any further extension would be required.

6. Counsel will continue drafting the brief in order to get it finished as soon as possible, and he hopes that will be ahead of the requested extended deadline. A week's extension is requested just to be safe.
7. Among other crimes, the Appellant in this case was convicted of murder, for which he was sentenced to 45 years' imprisonment. To say that the stakes are high is an understatement. The Appellant needs the best work possible done on this appeal.
8. Appellant's counsel believes there is good cause to grant the requested extension of this deadline and that extraordinary circumstances support the granting of this extension.

WHEREFORE Appellant prays for an order extending the time in which to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal by one week, to November 20, 2018.

Respectfully submitted,



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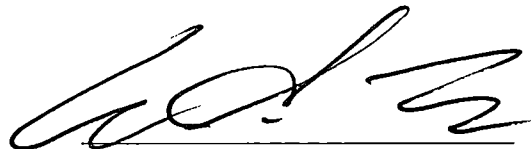
v.

John Michael Hughes.....Appellant.

PROOF OF SERVICE

I certify that I served the foregoing motion for extension of time by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

The Hon. Alan M. Wilson  
Melody J. Brown, Esq.  
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November 13, 2018