

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County

Honorable Thomas L. Hughston, Circuit Court Judge

ORIGINAL  
RECEIVED  
NOV 21 2018  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

KRAIG JERMAYNE ANDERSON,

APPELLANT

APPELLATE CASE NO. 2018-000703

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

Counsel for Kraig Jermayne Anderson respectfully requests a **final ten (10) day extension, until December 3, 2018**, in which to file the Initial Brief of Appellant and Designation of Matter in this case. **Counsel will file the Initial Brief of Appellant and Designation of Matter before the deadline if possible.** 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 Kraig Jermayne Anderson 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. Counsel has requested a fifth extension no more than three times in other cases since joining Appellate Defense in 2016.

3. Counsel will file the petition for rehearing in the case of The State v. Dajlia Torbit with this Court today, November 21, 2018. Counsel will file the petition for writ of certiorari and appendix in the case of Efrain Rivera v. State with the Supreme Court today, November 21, 2018. Counsel is also preparing the petitions for writ of certiorari and appendices in the cases of Kristy Rich v. State and Devin Sims v. State which counsel will file with the Supreme Court Monday, November 26, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Sasha Thomas v. State with the Supreme Court on November 20, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Alexander Matthews with this Court on November 16, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Anthony Wilson v. State with the Supreme Court on November 14, 2018. Counsel had an oral argument in The State v. Ontario Makins before the Court of Appeals on November 7, 2018. Counsel filed the petition for writ of certiorari to this Court and accompanying appendix in Samuel Alexander v. The State with the Supreme Court on October 22, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Bill Booker v. State with the Supreme Court on October 19, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Boyd Rowe v. State with the Supreme Court on October 15, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Andre Green v. State with the Supreme Court on October 10, 2018. Counsel filed the reply to return in

the case of William Justice v. State with the Supreme Court on October 8, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Mack Washington v. State with the Supreme Court on September 21, 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.

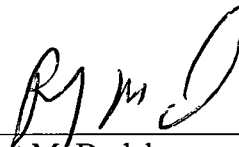
WHEREFORE, the undersigned counsel would respectfully request a **final ten (10) day extension, until December 3, 2018**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. **Counsel will file the Initial Brief of Appellant and Designation of Matter before the deadline if possible.** Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,

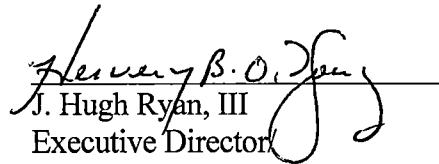


Taylor D. Gilliam  
Appellate Defender

Attorney for Appellant



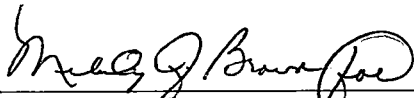
Robert M. Dudek  
Chief Appellate Defender



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 21st day of November, 2018.

I consent:



J. Benjamin Aplin, Esquire