

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Spartanburg County
J. Derham Cole, Circuit Court Judge

THE STATE,

RESPONDENT

V.

WILLIE JAMES MOORE,

APPELLATE CASE NO. 2018-000164

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

Counsel for Willie James Moore respectfully requests a **fourth and final** thirty (30) **until February 1, 2019**, days 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. This is a fourth request for an extension. 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 Willie James Moore respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

ORIGINAL

RECEIVED
APPELLANT
JAN 02 2019
SC Court of Appeals

J

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.

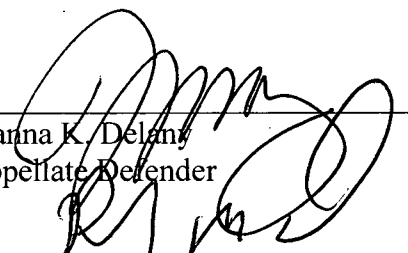
3. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Doni Terrelle Anderson v. The State with the Supreme Court on December 28, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of James L. Moore v. The State with the Supreme Court on December 13, 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 Robert Powell with this Court on November 28, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Joshua A. Reed v. The State with the Supreme Court on November 26, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Terrance L. Bland with this Court on November 16, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Zahi H., a Juvenile Under the Age of Seventeen with this Court on November 16, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Bradley Gerald Mullins v. The State with the Supreme Court on November 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Greene, III with this Court on October 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.

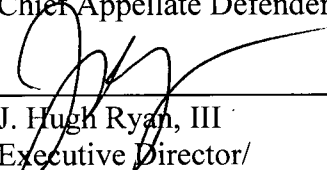
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **February 1, 2019**, in which to file the Initial Brief of Appellant and Designation of Matter in this case based upon the above exigent circumstances.

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 2nd day of January, 2019.

I do not oppose:



J. Benjamin Aplin, Esquire