

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County
Robin B. Stilwell, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JAHRU HAROLD SMITH,

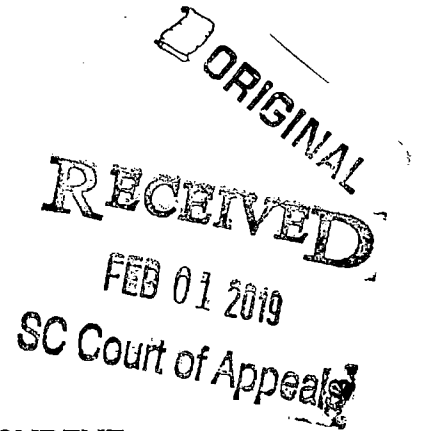
APPELLANT

APPELLATE CASE NO. 2018-000505

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

Counsel for Jahru Harold Smith, respectfully requests a **fourth and final** thirty (30) days **until March 4, 2019**, 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 Jahru Harold Smith, 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. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Robert J. Phipps v. The State of South Carolina with the Supreme Court on January 29, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leviticus Donyaski Young v. The State of South Carolina with the Supreme Court on January 25, 2019. Counsel filed the petition for rehearing in the case of The State of South Carolina v. James Bubba Patterson with the Court of Appeals on January 18, 2019. Counsel filed the petition for writ of certiorari in the case of Dyeshawn Foster v. The State of South Carolina with the Court of Appeals on January 18, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Michael Tyrone Quarles with the Court of Appeals on January 14, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leon M. Davis v. The State of South Carolina with the Supreme Court on January 11, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Jarod Tarrell Bostick with the Court of Appeals on January 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Fitzgerald Kennedy v. The State of South Carolina with the Supreme Court on December 31, 2018. Counsel filed the brief of petitioner in the case of Kristopher Wilmont Berry v. The State of South Carolina with the Supreme Court on December 14, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tarus Tramaine Henry, Sr. v. The State of South Carolina with the Supreme Court on December 12, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Anthony G. Linton v. The State of South Carolina with the Supreme Court on

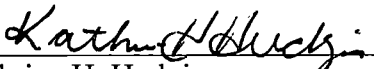
December 11, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eddie Ballenger v. The State of South Carolina with the Supreme Court on December 5, 2018.

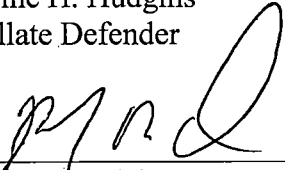
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

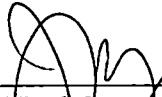
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **March 4, 2019**, in which to file the brief in this case based upon the above exigent circumstances.

Respectfully submitted,

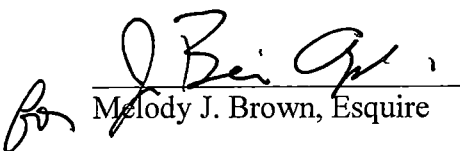

Kathrine H. Hudgins
Appellate Defender


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 February, 2019.

I do not oppose:


Melody J. Brown, Esquire