

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Jasper County
Carmen T. Mullen, Circuit Court Judge

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SC Court of Appeals

THE STATE,

RESPONDENT,

V.

ANEISHA SHAIRE YOUNG,

APPELLANT

Appellate Case No. 2018-000525

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

Counsel for Aneisha Shaire Young respectfully requests a **final extension of twenty (20) business days, until March 8, 2019**, 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 earlier 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.
2. Counsel for Aneisha Shaire Young 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.

3. **Counsel is speaking at the “Year End” CLE in Greenville, South Carolina today, February 8, 2019. Counsel filed the petition for rehearing in the case of The State v. Ahshaad Owens with this Court on February 7, 2019. Counsel filed the two issue initial brief of appellant and designation of matter in the murder case of The State v. Nick Evangelista involving one novel issue with this Court on February 6, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Varsheen Smith with the Court of Appeals on January 30, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Stephen Wilhite v. The State with the Supreme Court on January 28, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Wayne Hankinson with the Court of Appeals on January 25, 2019. Counsel filed the brief of petitioner in the case of Raphael Alexander Wooden v. The State with the Supreme Court on January 18, 2019. Counsel filed the brief of appellant in the case of The State v. Arsenio D. Colclough with the Court of Appeals on January 14, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William Zeigler v. The State with the Supreme Court on January 11, 2019. Counsel had an oral argument in the case of The State v. Devarous Parks before the Supreme Court on January 10, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jed D. Wheeler v. The State with the Supreme Court on January 9, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Stewart Middleton with the Court of Appeals on January 8, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jonathan A. Finney v. The State with the Supreme Court on January 4, 2019. Counsel filed the petition for writ of**

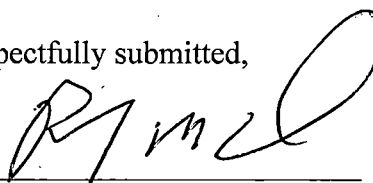
certiorari and accompanying appendix in the case of Daniel Jenkins v. The State with the Supreme Court on December 17, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Timiya Massey with the Court of Appeals on December 12, 2018. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training three less experienced appellate defenders and reviewing all their filings in advance.**

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 respectfully requests a **final extension of twenty (20) business days, until March 8, 2019**, 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 earlier if possible.** Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



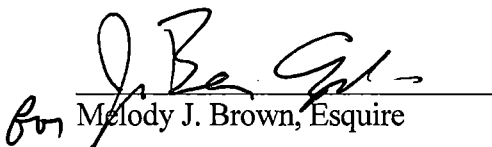
Robert M. Dudek
Chief Appellate Defender



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

This 8th day of February, 2019.

I consent:


Melody J. Brown, Esquire