

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Greenville County
Perry H. Gravely, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JANE KATHERINE HUGHES,

RECEIVED
FEB 19 2019
APPELLANT SC Court of Appeals

APPELLATE CASE NO. 2018-000659

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

Counsel for Jane Katherine Hughes, respectfully requests a **fourth and final** thirty (30) **until March 21, 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 Jane Katherine Hughes, 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 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 Wayne Michael Smith v. The State of South Carolina with the Supreme Court on February 19, 2019. Counsel had an oral argument in the case of The State of South Carolina v. Julius Rooks-McBean before the Court of Appeals on February 5, 2019. 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.


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

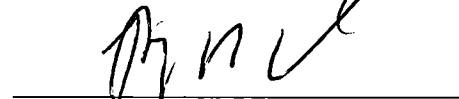
will hopefully become more manageable in the near future, and less extensions will need to be requested.

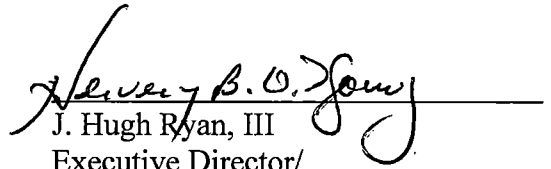
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **March 21, 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/
Hervery B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 19th day of February, 2019.

I do not oppose:


Melody J. Brown, Esquire