

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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ORIGINAL

Appeal from Dorchester County  
Honorable Clifton Newman, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

TYREECE RAHEAM STOKES,

APPELLANT

APPELLATE CASE NO. 2018-001419

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**RECEIVED**  
FEB 19 2019  
SC Court of Appeals

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

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Counsel for Tyreece Raheam Stokes respectfully requests a **fourth and final thirty (30) day extension, until March 21, 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. 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 Tyreece Raheam Stokes 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 plans to file the initial brief of appellant and designation of matter in the case of The State v. Eric Emanuel English with this Court on today, February 19, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Willie James Moore with this Court on February 1, 2019. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Edward Lee Whitlock, Jr., v. The State with the Supreme Court on January 18, 2019. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Tavish Dominique Yeargin v. The State with the Supreme Court on January 18, 2019. Counsel filed the return to petition for writ of certiorari in the case of Christopher Middleton v. The State with the Supreme Court on January 14, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Antoine Lakida Hightower with this Court on January 9, 2019. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Raymond Powell v. The State with the Supreme Court on January 7, 2019. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of William Richard Greene v. The State with the Supreme Court on January 3, 2019. 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.

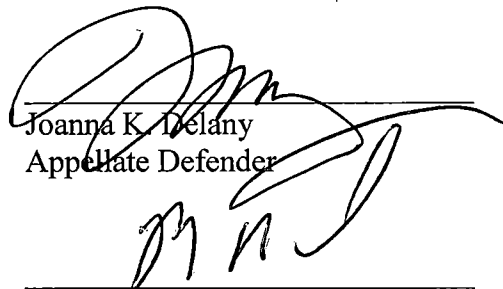
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

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 initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,

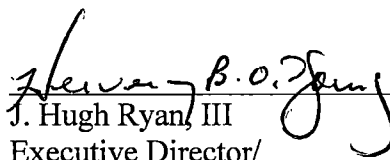


Joanna K. Delany  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender



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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:



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J. Benjamin Aplin, Esquire