

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Georgetown County

Honorable Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

APR 08 2019

THE STATE,

SC Court of Appeals

APPELLANT,

V.

M'ANDRE COCHRAN,

RESPONDENT

APPELLATE CASE NO. 2018-001023

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

Counsel for M'Andre Cochran respectfully requests a **fourth and final** extension of thirty (30) days **until May 8, 2019**, days in which to file the Initial Brief of Respondent and Designation of Matter in this 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 respondent and designation of matter are due to be filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for M'Andre Cochran 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 filed the initial brief of appellant and designation of matter in the case of The State v. William Heath with this Court on April 5, 2019. Counsel had an oral argument in the case of The State v. Darrell Ervin Raines, Jr. before this Court on April 2, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Thomas Smith with this Court on April 1, 2019. Counsel had an oral argument in the case of Vladimir W. Pantovich v. The State before the Supreme Court on March 27, 2019. Counsel had an oral argument in the case of The State v. Gerald R. Williams before the Supreme Court on March 26, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Robin Renee Herndon with the Supreme Court on March 21, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Demarco Johnson with this Court on March 19, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael P. Cornelius v. The State with the Supreme Court on March 11, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Scott Rowan with this Court on March 4, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Johnny James Cook with this Court on February 26, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Casey Jones, Jr. with this Court on February 19, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gabriel Gratto v. The State with the Supreme Court on February 14, 2019.

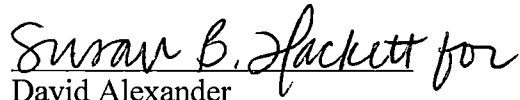
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

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

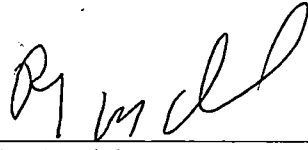
5. Counsel for the Attorney General's office consents to this request shown by signature below.

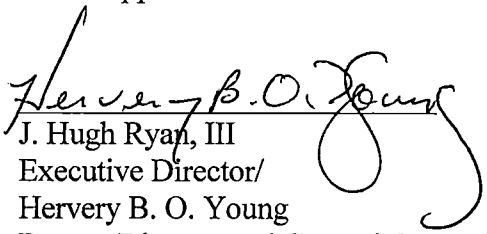
WHEREFORE, the undersigned counsel would respectfully request **a fourth and final thirty (30) day extension until May 8, 2019**, in which to file the initial brief of respondent and designation of matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,

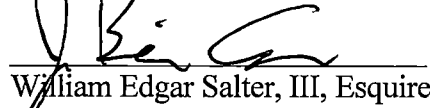
  
David Alexander  
Appellate Defender

Attorney for Respondent

  
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 April, 2019.

I consent:  
  
William Edgar Salter, III, Esquire