

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Aiken County  
Honorable William P. Keesley, Circuit Court Judge

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ORIGINAL

THE STATE,

V.

JOHNATHAN DEVON MOSS,

RESPONDENT  
**RECEIVED**  
JUN 03 2019  
SC Court of Appeals  
APPELLANT

APPELLATE CASE NO. 2018-001552

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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 Johnathan Devon Moss respectfully requests a **fourth and final thirty (30) day extension, until July 3, 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 Johnathan Devon Moss 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.

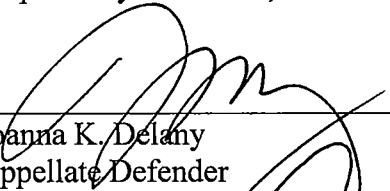
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Geraldo Dametrius Land with this Court on May 28, 2019. Counsel filed the petition for rehearing in the case of The State v. Bryan Jeffrey Ellis with this Court on May 23, 2019. Counsel had oral argument before the Supreme Court in the case of The State v. Jo Pradubsri on May 8, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Arthur James, III, with this Court on April 29, 2019. Counsel had oral argument in the case of The State v. Shawn Allen Mitchell before this Court on April 2, 2019. Counsel had oral argument before the Supreme Court in the case of The State v. Demario M. Thompson on March 28, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tyreece Raheam Stokes with this Court on March 21, 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.

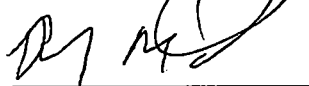
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension until July 3, 2019**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



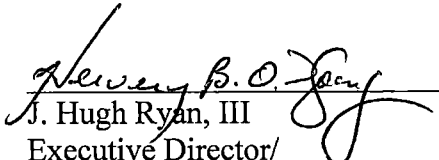
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Joanna K. Delany  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

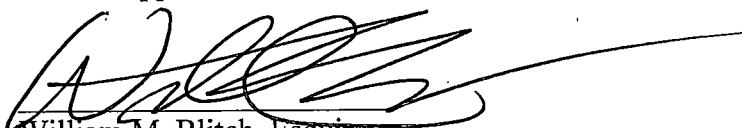


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J. Hugh Ryan, III  
Executive Director/  
Hervery B. O. Young  
Deputy Director and General Counsel/  
W. Lawrence Brown  
Deputy General Counsel and Training  
Director

This 3rd day of June, 2019.

I do not oppose:



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William M. Blich, Esquire