

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Spartanburg County
J. Derham Cole, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

V.

JYQUEZ JULIUS FREEMAN,

APPELLANT

Appellate Case No. 2018-001891

RECEIVED
JUN 12 2019
SC Court of Appeals

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Desmond J. Sams v. The State of South Carolina with the Supreme Court on June 6, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Venson Tyrone Jones with this Court on May 31, 2019. Counsel filed the return to petition for writ of certiorari in the case of McIver R. Feagin, Jr. v. The State of South Carolina with the Supreme Court on May 17, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ryan P. Deleston v. The State of South

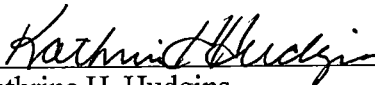
Carolina with the Supreme Court on May 13, 2019. Counsel filed the petition for rehearing in the case of State v. Dean Alton Holcomb with this Court on May 2, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Mitchell Logan Hinson v. The State of South Carolina with the Supreme Court on April 26, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joey Clark v. The State of South Carolina with the Supreme Court on April 24, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Jimmy Byron Keith Curles with this Court on April 16, 2019.

3. This request is made in good faith, and not for purposes of delay.

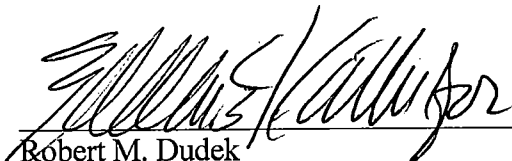
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully 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,




Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

June 12, 2019

I DO NOT OPPOSE:



For Melody J. Brown, Esquire