

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Roger M. Young, Circuit Court Judge

IN THE MATTER OF THE CARE AND
TREATMENT OF MARK RAINEY
A.K.A MARK RANEY

ORIGINAL

RECEIVED
JUL 08 2019
SC Court of Appeals

APPELLANT

APPELLATE CASE NO. 2018-001974

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

Counsel for Mark Rainey respectfully requests a **fourth and final** extension of thirty days **until August 7, 2019**, in which to file the Initial Brief of Appellant 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 appellant and designation of matter are due to be filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for Mark Rainey respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions

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

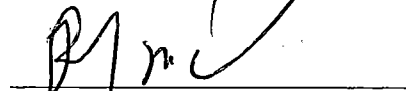
WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty day extension** until **August 7, 2019**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Lara M. Caudy
Appellate Defender

Attorney for Appellant




Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B.O. Young
General Counsel

This 8th day of July, 2019.

I consent:


for Deborah R.J. Shupe, Esquire

previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. On June 28, 2019, counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in The State v. Justin Antonio Butler with the Supreme Court. On June 26, 2019, counsel filed the initial brief of appellant and designation of matter in The State v. Demorris Octswavious Andrews with the Court of Appeals. On June 14, 2019, counsel filed the brief of petitioner in Trevaughn Ziontae Jackson v. The State with the Court of Appeals. On June 10, 2019, counsel filed the Anders brief of appellant and record on appeal in The State v. Damorius Dontavis Gaines with the Court of Appeals. On May 30, 2019, counsel had an oral argument in The State v. Terry Edward McCall before the Supreme Court. On May 30, 2019, counsel filed a petition for rehearing in The State v. Felix Kotowski with the Court of Appeals. On May 17, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Waymon Newton v. The State with the Supreme Court. On May 2, 2019, counsel filed a petition for rehearing in The State v. Justin Antonio Butler with the Court of Appeals. On May 2, 2019, counsel filed the Anders brief of appellant and record on appeal in The State v. Robert Len Gainey with the Court of Appeals. On April 26, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Vanessa L. Frayer v. The State with the Supreme Court.

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