

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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THE STATE,

v.

JYQUEZ JULIUS FREEMAN,

**ORIGINAL**  
**RECEIVED**  
JUL 12 2019  
RESPONDENT  
SC Court of Appeals

APPELLANT

APPELLATE CASE NO. 2018-001891

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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 Jyquez Julius Freeman respectfully requests a **fourth and final thirty (30) day extension, until August 12, 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. 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 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 Jyquez Julius Freeman 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.

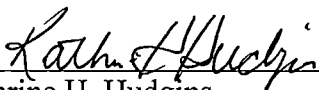
3. Counsel filed the petition for rehearing in the case of Aaron Young, Sr. v. The State of South Carolina with this Court on July 11, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Nathaniel Mitchell v. The State of South Carolina with the Supreme Court on July 1, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Dean Alton Holcomb v. The State of South Carolina with the Supreme Court on June 24, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Aundra Hunter, Jr. with this Court on June 21, 2019. 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.

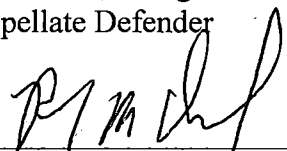
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

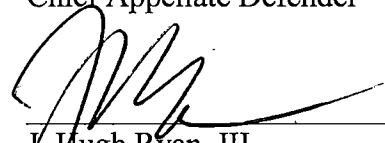
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension, until August 12, 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,

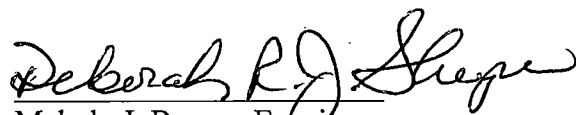
  
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Kathrine H. Hudgins  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

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

This 12<sup>th</sup> day of July 2019.

I do not oppose:

  
for Melody J. Brown, Esquire