

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Aiken County

Doyet A. Early, III, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

v.

BERTRAM MERLE BROWN,

APPELLANT

APPELLATE CASE NO. 2018-001429  
\_\_\_\_\_

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

The undersigned counsel would respectfully request a **final thirty-day extension until August 22, 2019** 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 exigent circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today having been extended by three prior orders of this Court.
2. Counsel filed a petition for rehearing in the case of State v. Fabian Lamichael Green in the Court of Appeals on July 11, 2019. Counsel filed the petition for writ of certiorari

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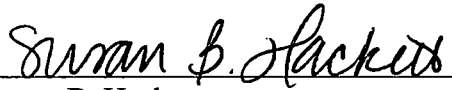
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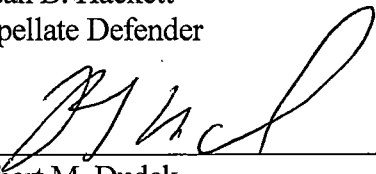
and accompanying appendix in the case of Robert Lee Wright v. The State in the Supreme Court on July 8, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Travis Latrell Lawrence in the Court of Appeals on July 5, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Willie Gunter v. The State in the Supreme Court on June 24, 2019. Counsel filed the Anders brief of appellant and Record on Appeal in the case of State v. Treshawn Markeese Jenkins in this Court on June 20, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Elbert Daniels, Jr. in this Court on June 7, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Tyrone Anthony Wallace, Jr. in this Court on June 3, 2019. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of James D. Lloyd v. State in the Supreme Court on May 23, 2019.

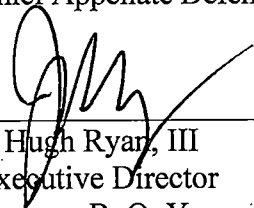
3. This request is made in good faith, and not for purposes of delay.
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension until August 22, 2019** in which to file the initial brief of appellant and designation of matter in this case. 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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Susan B. Hackett  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

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

July 22, 2019

I DO NOT OPPOSE:  
  
\_\_\_\_\_  
William M. Blitch, Esquire