

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Spartanburg County

Honorable J. Derham Cole, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

MARCUS QUANTE TODD,

APPELLANT

APPELLATE CASE NO. 2018-002024

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

RECEIVED
JUL 29 2019
SC Court of Appeals

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 will file the brief of petitioner in the case of Robin Renee Herndon v. The State with the Supreme Court today, July 29, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Kenneth Campbell with the Court of Appeals on July 26, 2019. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. John Kenneth Massey, Jr. with the Supreme Court on July 5, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Gene David,

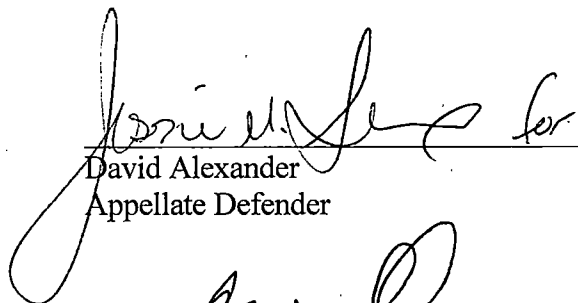
Evans, Jr. with the Court of Appeals on July 3, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey Cromer v. The State with this Court on June 28, 2019. Counsel filed the return to petition for writ of certiorari in the case of The State v. Allen Stone with this Court on June 20, 2019. Counsel filed the return to petition for rehearing in the case of The State v. Daniel Hamrick with the Court of Appeals on June 7, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. M'Andre Cochran with the Court of Appeals on May 20, 2019.

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

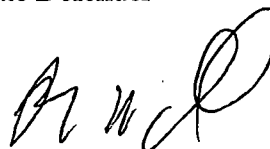
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a 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,



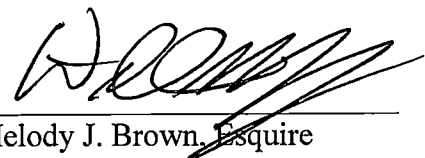
David Alexander
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

July 29, 2019

I DO NOT OPPOSE:


for Melody J. Brown, Esquire