

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Cherokee County
J. Mark Hayes, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

WILLIAM D. PENNINGTON,

RECEIVED

AUG 02 2019

APPELLANT **SC Court of Appeals**

Appellate Case No. 2018-001619

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 Shana Robinson v. The State with the Supreme Court on July 31, 2019. Counsel filed the petition for rehearing in the case of The State v. Ahshaad Mykiel Owens with this Court on July 25, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Abin Lee Lowman with this Court on July 24, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Andre Nicholas Crawford with this Court on

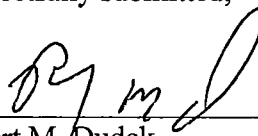
July 15, 2019. Counsel filed the petition for rehearing in the case of The State v. Jalann Williams with the Supreme Court on July 1, 2019. Counsel prepared a PowerPoint on Record Preservation and Making a Record and was on the faculty of the Public Defense 103 training in Greenville, South Carolina on July 1-3, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Karacus K. Freeman v. The State with the Supreme Court on June 28, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kwamaine Jarelle Ross with this Court on June 21, 2019. Counsel had oral argument in the case of The State v. Robert Lee Moore before the Supreme Court on June 10, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mikel Terrell Francis with this Court on June 3, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Casey Dajuan Geter with this Court on May 21, 2019. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training three less experienced appellate defenders and reviewing all their filings in advance.**

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

4. As indicated by the counsel 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,



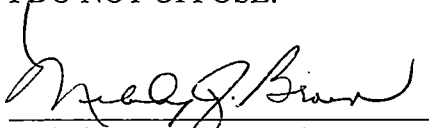
Robert M. Dudek
Chief Appellate Defender

Adam S. Ruffin
Appellate Defender

ATTORNEYS FOR APPELLANT

This 2nd day of August, 2019

I DO NOT OPPOSE:



Melody J. Brown, Esquire