

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Aiken County
Edgar W. Dickson, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

v.

JOHN ANDREW FINCH,

RECEIVED

AUG 21 2019

APPELLANT SC Court of Appeals

Appellate Case No. 2018-002264

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

Counsel for John Andrew Finch respectfully requests an extension of **thirty (30) days, until September 20, 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. 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 John Andrew Finch 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 return to petition for rehearing in the case of The State v. James Scott Cross with the Supreme Court on August 15, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Darrell Eugene Blackwell with this Court on August 12, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sylvester Keejuan King v. The State with the Supreme Court on August 9, 2019. Counsel filed the petition for rehearing in the case of The State v. John M. Ghent, Jr., with this Court on August 8, 2019. 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 has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project**

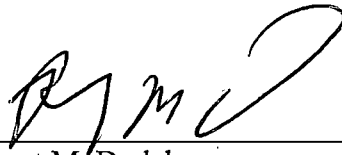
oversight, and training four less experienced appellate defenders and reviewing all their filings in advance.

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.

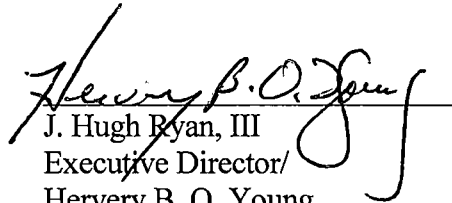
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **thirty (30) day extension, until September 20, 2019**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



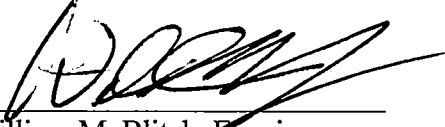
Robert M. Dudek
Chief Appellate Defender



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

This 21st day of August, 2019.

I consent:

A handwritten signature in black ink, appearing to read 'W. Blitch', written over a horizontal line.

William M. Blitch Esquire