

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Honorable Carmen T. Mullen, Circuit Court Judge

ORIGINAL
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SEP 04 2019
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JOSEPH LEONARD BROWN,

APPELLANT

APPELLATE CASE NO. 2018-001770

MOTION 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 will file the petition for writ of certiorari and accompanying appendix in the case of Chad Stalnaker v. The State with the Supreme Court today, September 4, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Susan Hendricks v. The State with the Supreme Court on August 30, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mark Day with the Court of Appeals on August 27, 2019. Counsel filed the petition for writ of certiorari and

the case of Charles Davis v. The State with the Supreme Court on August 23, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Clifton Cooke v. The State with the Supreme Court on August 16, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Willie Stevenson v. The State with the Supreme Court on August 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Frady v. The State with the Supreme Court on July 29, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Mark Lorenzo Blake with the Court of Appeals on July 24, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Wayne Cooper v. The State with the Supreme Court on July 22, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Isaac Williams v. The State with the Supreme Court on July 5, 2019.

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

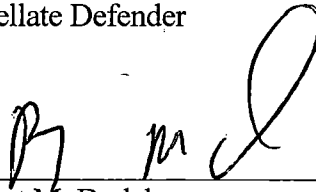
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

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,



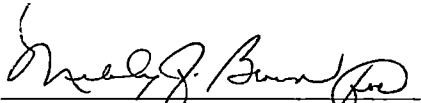
Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

September 4, 2019

I DO NOT OPPOSE:



William M. Blich, Esquire