

**ORIGINAL**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Laurens County

Letitia H. Verdin, Circuit Court Judge  
\_\_\_\_\_

THE STATE,

RESPONDENT,

V.

FREDERICK CALVIN JONES,

APPELLANT.

APPELLATE CASE NO. 2018-002232  
\_\_\_\_\_

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

**RECEIVED**  
SFP 11 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:

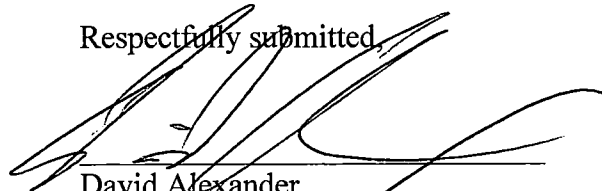
1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.
2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dameon Brown with the Court of Appeals on September 4, 2019. Counsel filed the return to petition for rehearing in the case of The State v. Vladimir Pantovich with the Supreme

Court on August 29, 2019. Counsel filed the brief of petitioner in the case of The State v. Robin Herndon with the Supreme Court on August 20, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Michael Collins with the Court of Appeals on August 7, 2019. Counsel filed the return to petition for rehearing in the case of The State v. Anthony Martin with the Supreme Court on August 2, 2019. Counsel filed the brief of petitioner in the case of The State v. Michael Juan Smith with the Supreme Court on July 31, 2019. Counsel filed the brief of petitioner in the case of Robin Renee Herndon v. The State with the Supreme Court on 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. 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.

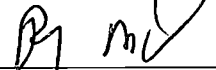
3. As indicated by the counsel below, counsel for the state graciously consents to or does not oppose this request.

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,



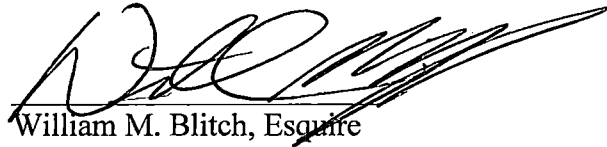
David Alexander  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

This 11<sup>th</sup> day of September, 2019.

I do not oppose:



William M. Blich, Esquire