

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Honorable Carmen T. Mullen, Circuit Court Judge

THE STATE,

V.

JOSEPH LEONARD BROWN,

APPELLANT

APPELLATE CASE NO. 2018-001770

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

Counsel for Joseph Leonard Brown respectfully requests an extension of a **final thirty (30) days, until November 4, 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. This is a fourth request for an extension. 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 Joseph Leonard Brown respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Lawrence Postell with the Court of Appeals on September 18, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio Fairey v. The State with the Supreme Court on September 16, 2019. Counsel had an oral argument before the Court of Appeals in the case of The State v. William Caughman on September 12, 2019. Counsel had an oral argument before the Court of Appeals in the case of Michael Elders v. The State on September 11, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Chad Stalnaker v. The State with the Supreme Court on September 5, 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 accompanying appendix in 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.

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.

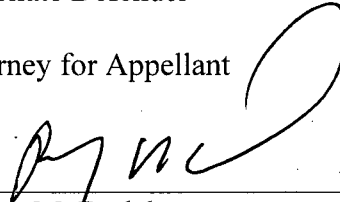
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until November 4, 2019** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

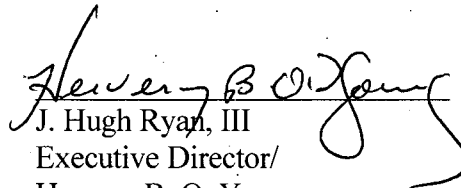


Taylor D. Gilliam
Appellate Defender

Attorney for Appellant



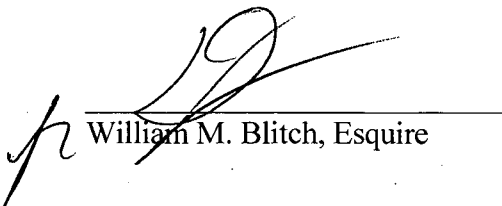
Robert M. Dudek
Chief Appellate Defender



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

This 4th day of October, 2019.

I consent:


William M. Blich, Esquire