

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Laurens County
Letitia H. Verdin, Circuit Court Judge

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OCT 11 2019

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

FREDERICK CALVIN JONES,

APPELLANT.

APPELLATE CASE NO. 2018-002232

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

Counsel for Frederick Calvin Jones, respectfully requests a **fourth and final** thirty (30) **until November 11, 2019**, in which to file the initial brief of appellant and designation of matter in the above-referenced 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 in this case are due to be served and filed with the Court today. The Court has granted counsel three previous extensions.

2. Counsel for Frederick Calvin Jones, 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.

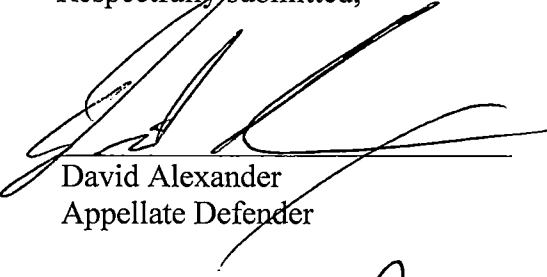
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daniel Lee Fludd with the Court of Appeals on October 4, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Donald Donald Hulon with the Court of Appeals on September 16, 2019. Counsel filed the Anders 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.

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.

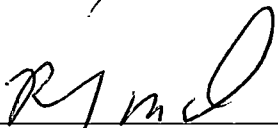
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until November 11, 2019, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

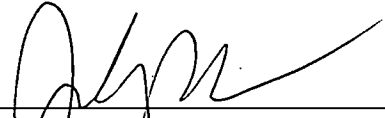
Respectfully submitted,



David Alexander
Appellate Defender



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 11th day of October, 2019.

I do not oppose:



William M. Blich, Esquire