

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Berkeley County

Honorable Deadra L. Jefferson, Circuit Court Judge

ORIGINAL

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OCT 18 2019

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

EVODIO HERNANDEZ-SANTO,

APPELLANT

APPELLATE CASE NO. 2019-000142

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

Counsel for Evodio Hernandez-Santo respectfully requests an extension of a **final thirty (30) days, until November 18, 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 Evodio Hernandez-Santo 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 her caseload, counsel hopes that no further extension requests will be required.

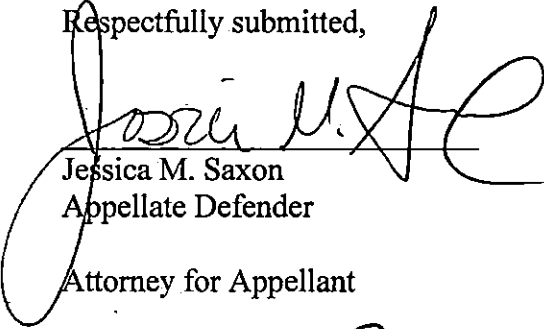
3. Counsel filed the initial brief of appellant in the case of The State v. Marcus Todd on September 27, 2019 with this Court. Counsel filed the return to petition for writ of certiorari in the case of Michael Williams v. The State on September 16, 2019 with the Supreme Court. Counsel filed the return to petition for writ of certiorari in the case of Marie Faltas v. The State on September 13, 2019 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Albert Taylor v. The State on September 3, 2019 with the Supreme Court. Counsel filed the reply to brief of petitioner in the case of John Willie Mack v. The State on August 15, 2019 with this Court. Counsel filed the petition for writ of certiorari in the case of Jason Johnson v. The State on August 9, 2019 with the Supreme Court.

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.

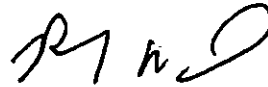
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until November 18, 2019** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

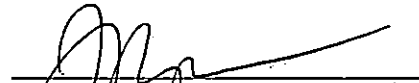


Jessica M. Saxon
Appellate Defender

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 18th day of October, 2019.

I consent:



William M. Blich, Esquire