

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Brooks P. Goldsmith, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

V.

MARY ANN GERMAN,

APPELLANT.

APPELLATE CASE NO. 2018-002090

RECEIVED
OCT 23 2019
SC Court of Appeals

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

Counsel for Mary Ann German, respectfully requests a **fourth and final** thirty (30) **until** November 25, 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 Mary Ann German, 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.

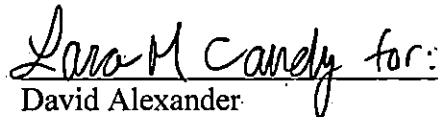
3. Counsel filed the return to petition for a writ of certiorari in the case of The State v. Billy Taylor with the Supreme Court on October 14, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daniel Lee Fludd with the Court of Appeals on October 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.

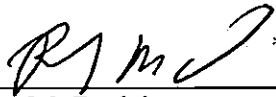
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

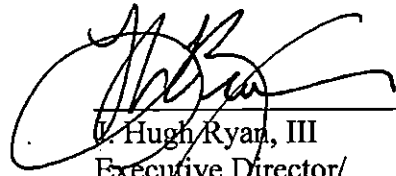
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **November 25, 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,

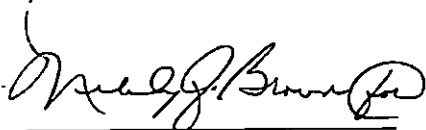

David Alexander
Appellate Defender


Robert M. Dudek
Chief Appellate Defender


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

This 23rd day of October, 2019.

I do not oppose:


William M. Blitch, Esquire