

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Charleston County

R. Ferrell Cothran, Circuit Court Judge

IN THE MATTER OF THE CARE AND
TREATMENT OF TIMOTHY J. BROWN,

APPELLANT.

APPELLATE CASE NO. 2019-000821

RECEIVED

NOV 08 2019

SC Court of Appeals

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

Counsel for Timothy J. Brown, respectfully requests a **fourth and final** thirty (30) days **until December 9, 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 Timothy J. Brown, 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.

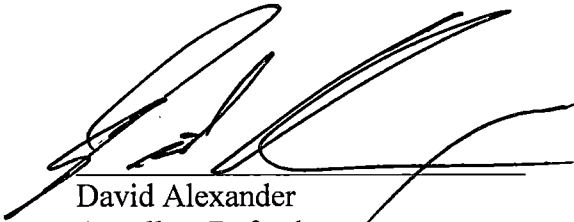
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William Brockmeyer v. The State with the Supreme Court on November 6, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Kenneth Wright with the Court of Appeals on November 4, 2019. Counsel filed the brief of respondent in the case of The State v. John Kenneth Massey with the Supreme Court on October 31, 2019. Counsel testified at a PCR Hearing held in Greenville in the case of Jonathan M. Holder v. The State on October 25, 2019. Counsel had an oral argument in the case of In the Matter of Gerald Barrett, Jr., before the Court of Appeals held in Clemson on October 22, 2019. 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.

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.

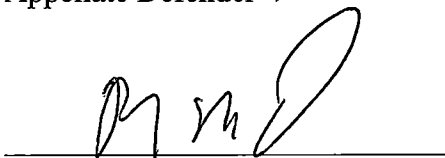
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **December 9, 2019**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

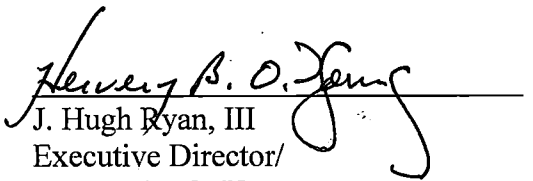
Respectfully submitted,



David Alexander
Appellate Defender



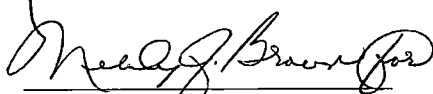
Robert M. Dudek
Chief Appellate Defender



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 8th day of November.

I do not oppose:



Deborah R.J. Shupe, Esquire