

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**ORIGINAL**

\_\_\_\_\_  
Appeal from Charleston County

R. Markley Dennis, Circuit Court Judge  
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THE STATE,

RESPONDENT,

V.

CHARLES JOSEPH BUNTON,

APPELLANT.

APPELLATE CASE NO. 2019-000491  
\_\_\_\_\_

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

**RECEIVED**  
NOV 08 2019  
SC Court of Appeals

The undersigned counsel respectfully requests a thirty-day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.
2. On November 8, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Moses Frasier v. The State with the Supreme Court. On October 31, 2019, counsel filed the Anders brief of appellant and record on appeal in The State v. Alonza

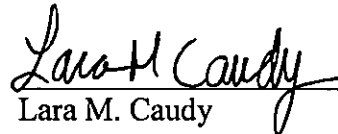
King Gibson with the Court of Appeals. On October 29, 2019, counsel filed a petition for writ of certiorari to the Court of Appeals in The State v. George Holmes with the Supreme Court. On October 25, 2019, counsel filed a brief of petitioner in The State v. Felix Kotowski with the Supreme Court. On October 18, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Brian Edward Norris v. The State with the Supreme Court. On October 15, 2019, counsel had an oral argument in The State v. Terrell Artieth Smith before the Supreme Court. On October 4, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Mildred Montgomery v. The State with the Supreme Court. On October 1, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Otis Maurice Robinson v. The State with the Supreme Court. On September 27, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Larry Brayboy v. The State with the Supreme Court. From September 23, 2019 through September 25, 2019, counsel attended the Annual Public Defender Conference in Myrtle Beach. On September 18, 2019, counsel filed the initial brief of appellant and designation of matter in The State v. Keunte Cobbs with the Court of Appeals. On September 12, 2019, counsel filed a petition for rehearing in The State v. George Holmes with the Court of Appeals.

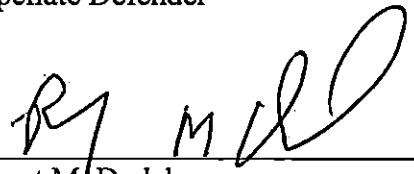
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. As indicated by the counsel below, counsel for the state graciously consents via electronic mail.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
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Lara M. Caudy  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender