

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Berkeley County
Honorable Deadra L. Jefferson, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

ROBERT DAVID NOLEN,

APPELLANT

APPELLATE CASE NO. 2019-000591

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER

RECEIVED
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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. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyrone Joseph Whatley v. The State of South Carolina with the Supreme Court on November 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy L. Frady v. The State of South Carolina with the Supreme Court on

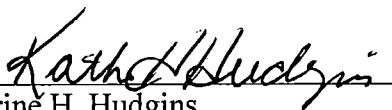
November 4, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derek Maner v. The State of South Carolina with the Supreme Court on October 23, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. David Paul Merritt with this Court on October 16, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Roy Gene Sutherland, III with this Court on September 30, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Olandio Workman with this Court on September 27, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Jose Reyes Reyes v. The State of South Carolina with the Supreme Court on September 20, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Aaron Young, Sr. v. The State of South Carolina with the Supreme Court on September 20, 2019.

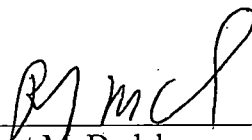
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. As indicated by the counsel below, counsel for the state graciously consents to or does not oppose this request.

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,


Kathrine H. Hudgins
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

This 18th day of November, 2019.

I do not oppose:


for Melody J. Brown, Esquire