

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
D. Craig Brown, Circuit Court Judge

**ORIGINAL
RECEIVED**
NOV 20 2019
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

ROBERT W. MCCAFFERY, JR.

APPELLANT.

APPELLATE CASE NO. 2019-000540

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

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

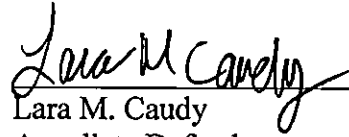
certiorari to the Court of Appeals in The State v. George Holmes with the Supreme Court. On October 25, 2019, counsel filed a brief of petitioner in The State v. Felix Kotowski with the Supreme Court. On October 18, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Brian 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.

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.

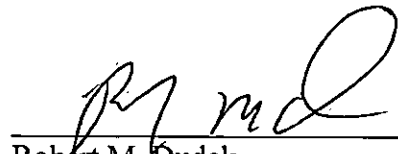
4. As indicated by the counsel below, counsel for the state graciously consents to or does not oppose this request.

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,



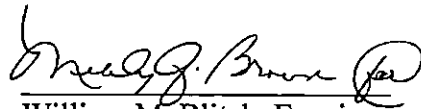
Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 20th day of November, 2019.

I do not oppose:



William M. Blich, Esquire