

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Richland County
DeAndrea G. Benjamin, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

V.

ANDRE TYRONE HEATLEY

APPELLANT

APPELLATE CASE NO. 2019-000165

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

RECEIVED
DEC 13 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 December 12, 2019, counsel filed the initial brief of appellant and designation of matter in The State v. Frederick Harrison Towe with this Court. On December 4, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Brandon James Littell v. The State with the Supreme Court. On November 25, 2019, counsel filed a petition for a writ of certiorari to this Court in The State v. Anthony M. Enriquez with the Supreme Court. On

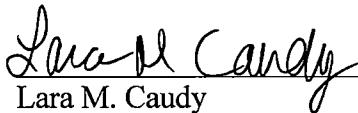
November 8, 2019, counsel filed a petition for writ of certiorari and accompanying appendix in Moses Frasier v. The State with the Supreme Court. On October 31, 2019, counsel filed the initial brief of appellant and designation of matter in The State v. Alonza King Gibson with this Court. On October 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.

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 her caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

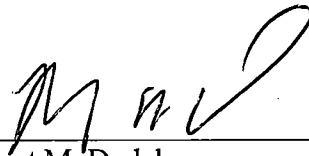
4. As indicated by the consent below, counsel for the state graciously consents to or does not oppose this request.

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,



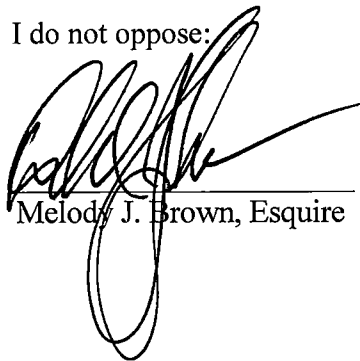
Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

December 13, 2019

I do not oppose:



Melody J. Brown, Esquire