

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County

Thomas A. Russo, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

V.

MARREESE JAMAUL FRIPP,

APPELLANT.

APPELLATE CASE NO. 2018-002265

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

RECEIVED

DEC 16 2019

SC Court of Appeals

Counsel for Marreese Jamaul Fripp, respectfully requests a **final extension of thirty days until January 15, 2020**, 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 fifth request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. The Court has granted counsel four previous extensions. Counsel understands that a fifth extension is strongly disfavored.

2. Counsel for Marreese Jamaul Fripp, 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 her

caseload, counsel hopes that no further extension requests will be required. **Counsel regrets having to request this extension and will make every effort to file the brief prior to the deadline.**

3. Counsel is diligently working on The State v. Tammy Caison Moorers. *The transcripts in Moorers span nearly twenty-seven hundred pages and counsel anticipates filing a brief in the next few days raising five issues.* Today, December 16, 2019, counsel will file a petition for writ of certiorari and accompanying appendix in Tamarcus Long v. The State with the Supreme Court. On December 12, 2019, counsel filed the initial brief of appellant and designation of matter in The State v. Frederick Harrison Towe with the Court of Appeals. 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 the Court of Appeals 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 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.

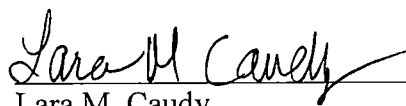
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload


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

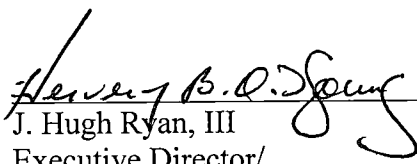
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension** until **January 15, 2020**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Lara M. Caudy
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 16th day of December, 2019.

I do not oppose:


William M. Blich, Esquire
32.