

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Dorchester County
Edgar W. Dickson, Circuit Court Judge

RECEIVED
FEB 21 2013
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JASON A. BAUMAN,

APPELLANT

Appellate Case No. 2012-212285

PETITION 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. Counsel is filing the initial brief of appellant and designation of matter in the case of State v. Tremaine Davis in this Court today, February 21, 2012. Counsel filed the brief of petitioner in the case of State v. Juan Orozco in the Supreme Court on February 20, 2013. Counsel filed the reply to the return to the petition for writ of certiorari in the case of James Robertson v. State, a **death penalty** case in the Supreme Court (with Co-Counsel Matt Bogan, pro bono, of the Nelson Mullins firm) on February 19, 2013. On February 13, 2013, Counsel

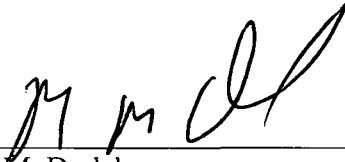
filed the petition for writ of certiorari and accompanying appendix in the case of Paul Reid v. State in the Supreme Court, the return to the petition for writ of certiorari in the case of State v. Richard Bill Niles, Jr. in the Supreme Court, and the petition for rehearing in the case of State v. Christopher M. Stephens in this Court. Counsel had an oral argument in the case of State v. Steven Barnes, a **death penalty** case in the Supreme Court, on February 5, 2013. Additionally, Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Gene Tony Cooper in the United States Supreme Court, on February 5, 2013. Counsel filed the petition for rehearing in the case of State v. Jason Franks in this Court on January 31, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Dadrin Jerome Johnson (in the COA) in the Supreme Court on January 18, 2013. Counsel had an oral argument in the case of State v. Adams Gibson in the Supreme Court on January 10, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyrone A. Ravenell v. State in the Supreme Court on January 7, 2013. In December, 2012, Counsel filed the return to petition for writ of certiorari in the case of James v. Helms v. State, and the petition for writ of certiorari and accompanying appendix in the case of State v. Randy Vickery (in the COA). Additionally, in December, 2012, Counsel filed the initial briefs of appellant and designations of matter in the cases of State v. Gerald Pitts, State v. Leroy Laird and State v. Tito Harris. **Counsel also has extensive administrative duties as the Chief Appellate Defender.**

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.

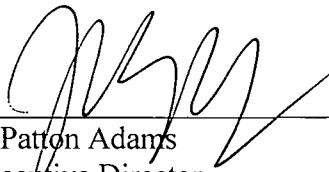
4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

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,



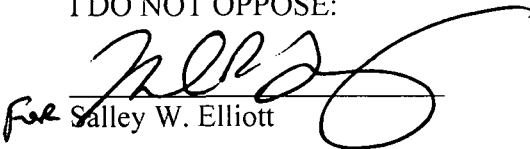
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director
J. Hugh Ryan, III
General Counsel

February 21, 2013

I DO NOT OPPOSE:



Salley W. Elliott