

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Oconee County
Honorable R. Scott Sprouse, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

V.

MICHAEL LEE TROTTER,

APPELLANT

APPELLATE CASE NO. 2019-000378

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

RECEIVED
JAN 02 2020
SC Court of Appeals

Counsel for Michael Lee Trotter respectfully requests a **fourth and final thirty (30) day extension, until February 3, 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 fourth request for an extension. In support of this request, counsel shows:

1. The Initial Brief of Appellant and Designation of Matter in this case are due to be served and filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for Michael Lee Trotter 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.

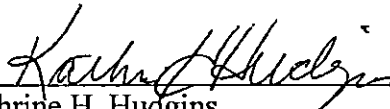
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sandy Lee Locklear v. The State of South Carolina with the Supreme Court on December 23, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Tristian Cummings with this Court on December 20, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jerry Dean Heard v. The State of South Carolina with the Supreme Court on December 4, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Keshawn Melvin Rice with this Court on December 4, 2019. 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.

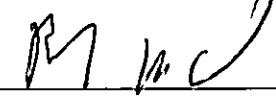
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

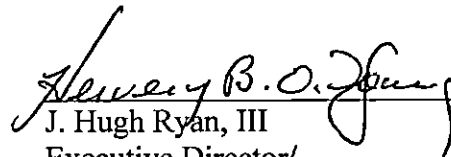
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension, until February 3, 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,

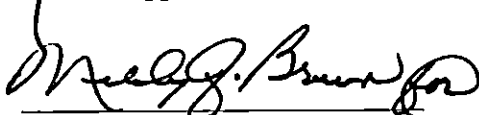

Kathrine H. Hudgins
Appellate Defender


Robert M. Dudek
Chief Appellate Defender


J. Hugh Ryan, III
Executive Director/
Hervery B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 2nd day of January, 2020.

I do not oppose:


William M. Blich, Jr., Esquire