

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

ORIGINAL

Appeal from Charleston County
R. Scott Sprouse, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JAMAA ATO WASHINGTON, JR.,

APPELLANT

APPELLATE CASE NO. 2019-000859

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

RECEIVED
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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. Counsel is preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the initial brief of appellant and designation of matter in the cases of The State v. Carmie Josette Nelson, and The State v. Richard Douglas Waldrup, which she plans to file with this Court in the upcoming weeks, and on the petition for writ of certiorari and accompanying

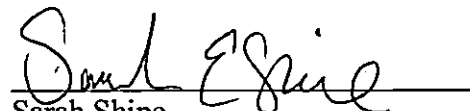
appendix in the cases of Worth Edward Cook v. The State, and Booker T. Hill v. The State, which she plans to file with the Supreme Court in the upcoming weeks.

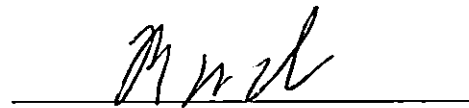
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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.

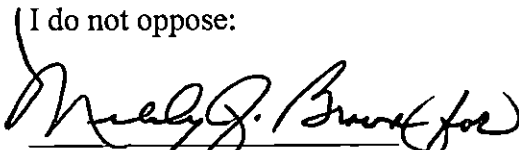
Respectfully submitted,


Sarah Shipe
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

This 2nd day of January, 2020.

I do not oppose:


William M. Blitch, Esquire