

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Allendale County  
R. Lawton McIntosh, Circuit Court Judge  
\_\_\_\_\_

**ORIGINAL**  
**RECEIVED**  
JAN 15 2020  
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

GABRIEL JOYNER,

APPELLANT

Appellate Case No. 2019-000622  
\_\_\_\_\_

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 was co-counsel to Lara M. Caudy, when they filed the initial brief of appellant and designation of matter in the case of The State v. Tammy Caison Moorner with this Court on January 6, 2020. Counsel filed the return to the State's petition for writ of certiorari in the case of The State v. Joseph Bowers with the Supreme Court on December 27, 2019. Counsel had an oral argument before this Court on December 11, 2019 in The State v. Justin Jamal Warner. Counsel had an oral argument before this Court on December 9, 2019 in The State v. Edward Primo

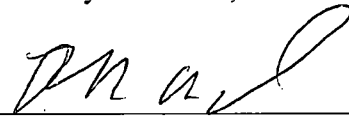
Bonilla. Counsel filed the brief of appellant and designation of matter in the case of The State v. John Andrew Finch with this Court on December 2, 2019. Counsel was co-counsel to Victor Seeger and Lara M. Caudy, when they filed the petition for rehearing in the case of The State v. Jonathan Donell Rhodes with this Court on November 21, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. John M. Ghent, Jr., to the Supreme Court from this Court on November 12, 2019. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training four less experienced appellate defenders and reviewing all their filings in advance.**

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,

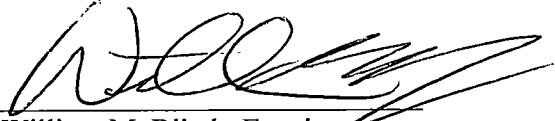


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Robert M. Dudek  
Chief Appellate Defender

This 15th day of January, 2020

I DO NOT OPPOSE:



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William M. Blich, Esquire