

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Spartanburg County

J. Derham Cole, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

V.

JODY RAY THOMPSON,

APPELLANT.

RECEIVED

FEB 12 2020

SC Court of Appeals

APPELLATE CASE NO. 2019-000313

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

Counsel for Jody Ray Thompson respectfully requests a **fourth and final** thirty (30) day extension **until March 13, 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 Jody Ray Thompson 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. On February 12, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Andre Heatley with the Court of Appeals. On February 3, 2020, counsel filed a petition for writ of certiorari and accompanying appendix in Gussie Henry Hilton v. The State with the Supreme Court. On January 31, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Robert McCaffrey with the Court of Appeals. On January 28, 2020, counsel, along with Victor Seeger, filed a petition for writ of certiorari to the Court of Appeals in The State v. Jonathan Donell Rhodes with the Supreme Court. On January 23, 2020, counsel filed a petition for rehearing in The State v. Shane Alexander Washington with the Court of Appeals. On January 17, 2020, counsel, along Robert Dudek and David Alexander, filed a petition for writ of certiorari and accompanying appendix in Marion Lindsey v. The State with the Supreme Court. On January 15, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Marreese Jamaul Fripp with the Court of Appeals. On January 8, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Charles Bunton with the Court of Appeals. On January 8, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Filiciano Jermaine Smith with the Court of Appeals. On January 6, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Tammy Caison Moorer with the Court of Appeals. On December 31, 2019, counsel filed the initial brief of appellant and designation of matter in In the Matter of the Care and Treatment of Antonio Young with the Court of Appeals. On December 16, 2019, counsel filed 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.

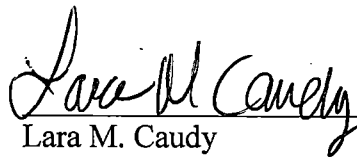
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

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

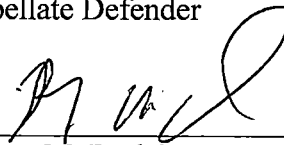
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension until March 13, 2020**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

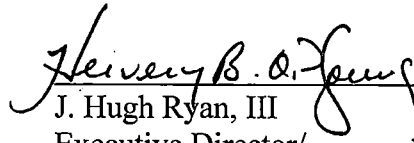
Respectfully submitted,



Lara M. Caudy
Appellate Defender



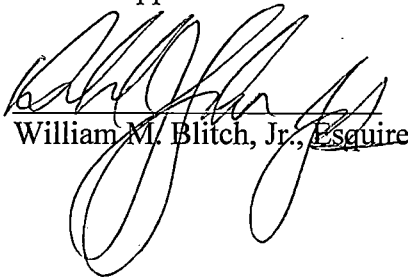
Robert M. Dudek
Chief Appellate Defender



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 12th day of February, 2020.

I do not oppose:



William M. Blich, Jr., Esquire