

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Cherokee County  
Honorable J. Mark Hayes, Circuit Court Judge

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ORIGINAL

THE STATE,

RESPONDENT,

V.

RICHARD DOUGLAS WALDRUP,

RECEIVED  
APPELLANT

FEB 20 2020

SC Court of Appeals

APPELLATE CASE NO. 2019-00043

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

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Counsel for Richard Douglas Waldrup respectfully requests a **fourth and final thirty (30) day extension, until March 23, 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. 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 Richard Douglas Waldrup 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.

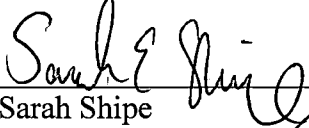
3. Counsel is preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari and accompanying appendix in the cases of Stanley Wright v. The State, Worth Edward Cook v. The State, and Booker T. Hill v. The State, which she plans to file with the Supreme Court in the upcoming weeks. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Sheldon Huger v. The State with the Supreme Court on February 18, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Jamaa Ato Washington, Jr., with this Court on February 3, 2020. Counsel, along with co-counsel Robert M. Dudek, filed the initial brief of appellant and designation of matter in the case of The State v. Carmie Josette Nelson with this Court on January 31, 2020. Counsel makes this request in good faith and not for purpose of delay.

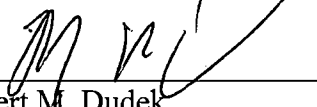
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

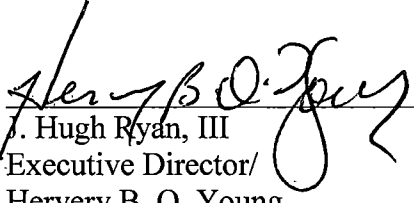
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension until March 23, 2020**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances. Counsel 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,

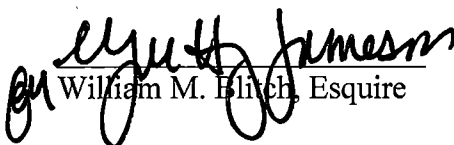
  
\_\_\_\_\_  
Sarah Shipe  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

  
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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 20th day of February

I do not oppose:

  
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William M. Blich, Esquire