

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

ORIGINAL

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Appeal from Lancaster County  
Thomas L. Hughston, Circuit Court Judge  
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THE STATE,

RESPONDENT,

v.

TIFFANY MAE MILES,

APPELLANT.

APPELLATE CASE NO. 2019-000893  
\_\_\_\_\_

RECEIVED

MAR 06 2020

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

SC Court of Appeals

Counsel for Tiffany Mae Miles respectfully requests a **fourth and final** thirty (30) day extension **until April 6, 2020**, days 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 Tiffany Mae Miles 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 March 4, 2020, counsel filed the initial brief of appellant and designation of matter in The State v. Jody Thompson with the Court of Appeals. On February 21, 2020, counsel filed a petition for writ of certiorari and accompanying appendix in Jabriel Singleton v. The State with the Supreme Court. On February 12, 2020, counsel filed the 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 Moorner with the Court of Appeals.

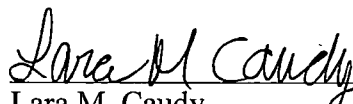
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

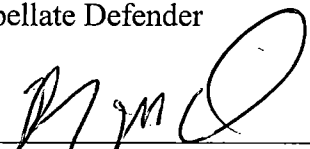
will hopefully become more manageable in the near future, and less extensions will need to be requested.

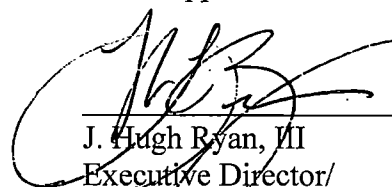
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension** until **April 6, 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,

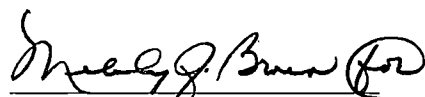
  
\_\_\_\_\_  
Lara M. Caudy  
Appellate Defender

  
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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 6<sup>th</sup> day of March, 2020.

I do not oppose:

  
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William M. Blitch, Jr., Esquire