

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Honorable R. Markley Dennis, Circuit Court Judge

ORIGINAL

THE STATE,

RESPONDENT,

V.

SETH HASSAN SMITH,

APPELLANT

APPELLATE CASE NO. 2019-001418

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

RECEIVED
MAR 08 2020
SC Court of Appeals

Counsel for Seth Hassan Smith respectfully requests a **fourth and final thirty (30) day extension, until April 8, 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 Seth Hassan Smith 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.

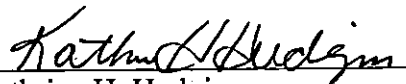
3. Counsel filed the petition for rehearing in the case of Vance Ross v. The State of South Carolina with this Court on February 26, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Brandon Heath Clark v. The State of South Carolina with the Supreme Court on February 24, 2020. Counsel filed the petition for rehearing in the case of Kelvin Jones v. The State of South Carolina with this Court on February 13, 2020. Counsel filed the petition for rehearing in the case of Tommy McGee v. The State of South Carolina with this Court on February 13, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Darryl Eugene Coleman with this Court on February 7, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Michael Lee Trotter with this Court on February 3, 2020. Counsel filed the petition for rehearing in the case of Guadalupe Guzman Morales v. The State of South Carolina with this Court on January 23, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jason Sinatra Edwards v. The State of South Carolina with the Supreme Court on January 22, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Robert David Nolen with this Court on January 16, 2020. Counsel filed the brief of appellant pursuant to White v. State in the case of Leroy Glover, Jr. v. The State of South Carolina with the Supreme Court on January 9, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leroy Glover, Jr. v. The State of South Carolina with the Supreme Court on January 9, 2020.

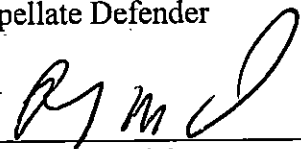
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

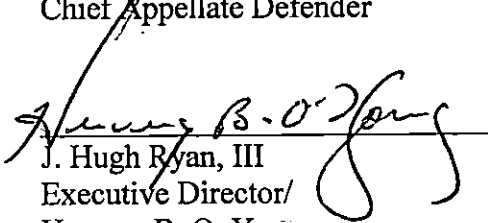
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension, until April 8, 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,

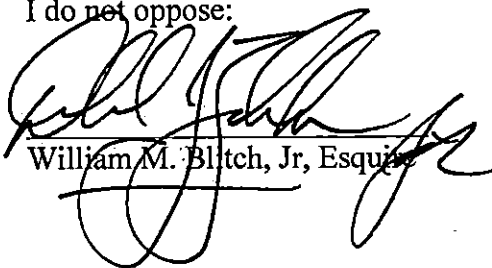

Kathrine H. Hudgins
Appellate Defender


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 9th day of March, 2020.

I do not oppose:


William M. Blitch, Jr, Esquire