

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from York County

William A. McKinnon, Circuit Court Judge  
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ORIGINAL

RECEIVED

MAR 13 2020

RESP. JUDGE, SC Court of Appeals

THE STATE,

v.

LAGERALD L. DUNHAM,

APPELLANT.

APPELLATE CASE NO. 2019-001538  
\_\_\_\_\_

MOTION FOR AN EXTENSION TO FILE  
THE 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. On March 12, 2020, counsel filed the brief of appellant and designation of matter in The State v. Tiffany Miles with the Court of Appeals. 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

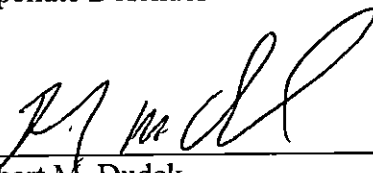
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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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Lara M. Caudy  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

This 13<sup>th</sup> day of March, 2020:

I do not oppose:

  
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William M. Blitch, Jr., Esquire