

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Greenville County

Edward W. Miller, Circuit Court Judge

ORIGINAL

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SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JACQUELINE YVETTE SULLIVAN,

APPELLANT

Appellate Case No. 2012-212562

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

Counsel for Jacqueline Y. Sullivan petitions the Court for a thirty day extension in which to file the initial brief of appellant and designation of matter in this case. In support of this petition, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. This is the fourth extension for Ms. Sullivan.

2. Counsel for Ms. Sullivan respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.

3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Joseph Lathan Kelly (in the COA) in this Court. Counsel filed the Anders brief of appellant and record on appeal in the case State v. Jakevian Pulley in the Court of

Appeals on Wednesday, February 27, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Julio Angelo Hunsberger in the Court of Appeals on Friday, February 22, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Herman Donald McKnight v. State in the Supreme Court on Tuesday, February 19, 2013. Counsel filed the brief of petitioner in the case of In the Interest of Cleo B., in the Court of Appeals on Thursday, February 14, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case of Victor Smith v. State in the Court of Appeals on Monday, February 11, 2013. Counsel filed the initial brief of appellant in the case of Clarence J. Fishburne v. State in the Court of Appeals on Monday, February 11, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case State v. Edward Martin Clarkson in the Court of Appeals on Thursday, February 7, 2013. Counsel filed the brief of petitioner in the case of Roderick Bradley v. State in the Court of Appeals on Thursday, February 7, 2013. Counsel had an oral argument in the case of State v. Craig Keeling in the Court of Appeals on Tuesday, February 5, 2013. Counsel filed the brief of petitioner in the case of Thomas McCall v. State in this Court on February 4, 2013. On January 30, 2013, Counsel had to appear in PCR Court in Lexington County as a witness in Frank Tolen v. State. Counsel filed the initial brief of appellant in State v. Anthony Rodrickus Carter in the Court of Appeals. Counsel filed the brief of appellant pursuant to White v. State in State v. Ronald Black in the Court of Appeals on January 28, 2013. Counsel filed the brief of appellant and record on appeal in State v. Frederick R. Chappell in the Court of Appeals on January 25, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in Darryl Frierson v. State in this Court on January 10, 2013. On January 7, 2013, counsel filed the initial brief of appellant and designation of matter in State v. Cesar Portillo in the Court of Appeals. Counsel filed the brief of petitioner in the case of State v. Wesley Smith, the petition for writ of certiorari and accompanying appendix in the

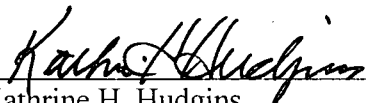
case of State v. Doyle Marion Garrett (in the COA), and the Return to the petition for writ of certiorari in the case of Antonio D. Bordeaux v. State all in this Court on December 27, 2012.

4. 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.


5. As indicated by her consent 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.

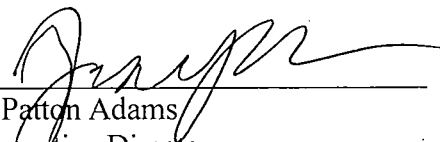
Respectfully submitted,



Kathrine H. Hudgins
Appellate Defender

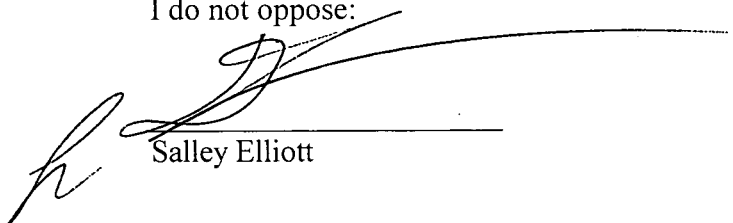


Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director
J. Hugh Ryan, III
General Counsel

March 1, 2013
I do not oppose:



Salley Elliott