

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Spartanburg County

Honorable Lee S. Alford, Circuit Court Judge

RECEIVED

May 05 2020

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

AMYN. TAYLOR,

APPELLANT

APPELLATE CASE NO. 2019-001117

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

Counsel for Amy N. Taylor respectfully requests an extension of a **final thirty (30) days, until June 4, 2020**, in which to file the Initial Brief of Appellant and Designation of Matter in this case out of time. 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 were due to be filed with the Court on April 27, 2020. Due to an administrative error, this extension was not timely filed. Upon realizing this error, counsel acted immediately to file this motion. The Court has granted counsel three previous extensions.

2. Counsel for Amy N. Taylor 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 writ of certiorari in the case of Gerald Green v. The State on May 5, 2020 with the Supreme Court. Counsel filed the initial brief of appellant in the case of The State v. Mario Moise on April 13, 2020 with the Court of Appeals. Counsel filed the petition for rehearing in the case of Marie Faltas v. The State on April 7, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of John Willie Mack v. The State on March 3, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Devatee Clinton v. The State on March 3, 2020 with the Supreme Court.

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.

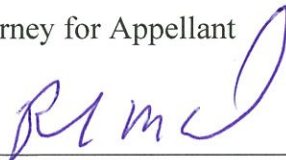
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through May 21, 2020. That emailed general consent was dated April 21, 2020

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until June 4, 2020** in which to file the initial brief of appellant and designation of matter in this case out of time based upon the above exigent circumstances.

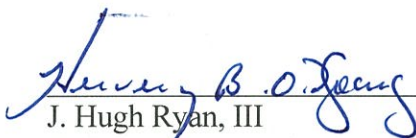
Respectfully submitted,

s/Jessica M. Saxon _____
Jessica M. Saxon
Appellate Defender

Attorney for Appellant



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 5th day of May, 2020.