

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

May 28 2020

SC Court of Appeals

Appeal from Spartanburg County
Grace Gilchrist Knie, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

Thomas Raynes Marett,

APPELLANT

APPELLATE CASE NO. 2019-001385

PETITION FOR EXTENSION TO FILE
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. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Curnez Ellerbee with this Court on May 8, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Marcus A. Nelson v. State in the Supreme Court on April 27, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Montez Wright v. State in the Supreme Court on April 23, 2020.

Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher Heller v. State in the Supreme Court on April 15, 2020. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Santos Aguilera v. State in the Supreme Court on April 3, 2020.

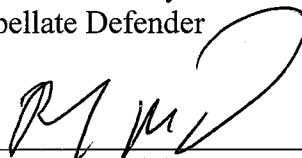
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. Counsel for the state, Matthew Buchanan, Esq., graciously consents to 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,

s/Joanna K. Delany
Joanna K. Delany
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

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CERTIFICATE OF SERVICE

Pursuant to the Supreme Court's Order "RE: Operation of the Appellate Courts During the Coronavirus Emergency," dated March 20, 2020, the undersigned hereby certifies a true copy of the Motion for an Extension of Time in the above-referenced case has been served upon Matthew Buchanan, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 28th day of May, 2020.

s/ Joanna K. Delany

Joanna K. Delany
Appellate Defender

ATTORNEY FOR APPELLANT