

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

May 27 2020

Appeal from Greenville County

SC Court of Appeals

Honorable R. Lawton McIntosh, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

MICHAEL G. STROTHER,

APPELLANT

APPELLATE CASE NO. 2019-001328

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

Counsel for Michael G. Strother respectfully requests an extension of a **final thirty (30) days, until June 26, 2020**, in which to file the Initial Brief of Appellant and Designation of Matter in this 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 are due to be filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for Michael G. Strother 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 and accompanying appendix in the case of August Kreis v. The State with the Supreme Court on May 14, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alfred Dunkin v. The State with the Supreme Court on April 30, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Sartin v. The State with the Supreme Court on April 9, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Taiwan Hardy v. The State with the Supreme Court on March 27, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Duckett v. The State with the Supreme Court on March 11, 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.

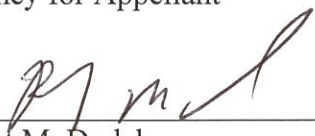
5. Counsel for the Attorney General's office graciously does not oppose this extension request via electronic mail.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until June 26, 2020** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

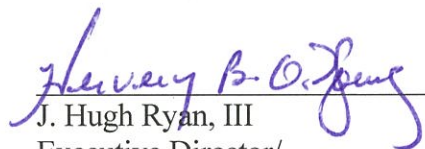
Respectfully submitted,

s/Taylor D. Gilliam _____
Taylor D. Gilliam
Appellate Defender

Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervery B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 27th day of May, 2020.

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CERTIFICATE OF SERVICE

I certify that a copy of the Motion for an Extension of Time in which to file the Initial Brief of Appellant in the above referenced case has been served upon William M. Blich, Jr., Esquire, by sending to opposing counsel's primary e-mail address as listed in the Attorney Information System (AIS), this 27th day of May, 2020.

s/Taylor D. Gilliam
Taylor D Gilliam
Appellate Defender

ATTORNEY FOR APPELLANT