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May 27 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from York County
Honorable Robert E. Hood, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JOHN W. THOMASSON, SR.,

APPELLANT

APPELLATE CASE NO. 2019-001517

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

Counsel for John W. Thomasson, Sr. respectfully requests a **fourth and final thirty (30) day extension, until June 26, 2020**, in which to file the Initial Brief of Appellant and Designation of Matter in the above-referenced 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 in this case are due to be served and filed with the Court today. The Court has granted counsel three previous extensions.
2. Counsel for John W. Thomasson, Sr. 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 supplemental motion to seal in the case of Antonio Sadler v State of South Carolina with this Court on April 30, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian Jenkins v. The State with the Supreme Court on April 6, 2020. Counsel filed the petition for rehearing in the case of The State v. Eric Terrell Spears with the Supreme Court on February 27, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daniel Antwan Rogers with this Court on February 20, 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.

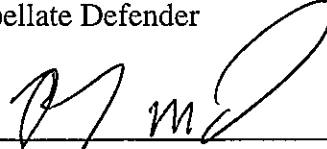
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2020. That emailed general consent was dated May 20, 2020.

WHEREFORE, the undersigned counsel would respectfully request a **fourth and final thirty (30) day extension, 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.

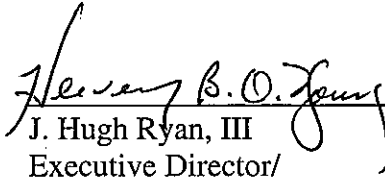
Respectfully submitted,

s/ Victor R. Seeger

Victor R. Seeger
Appellate Defender



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 27th day of May, 2020.

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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 which to File the Initial Brief of Appellant and Designation of Matter in the above-referenced case have been served upon William M. Blich, Jr., Esquire at the primary e-mail address listed in the Attorney Information System (AIS), this 27th day of May, 2020.

s/ Victor R. Seeger

Victor R. Seeger
Appellate Defender

ATTORNEY FOR APPELLANT