

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Spartanburg County

Honorable Lee S. Alford, Circuit Court Judge

**RECEIVED**

**Jun 04 2020**

**SC Court of Appeals**

THE STATE,

RESPONDENT,

V.

AMY N. 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

Counsel for Amy N. Taylor respectfully requests a **final ten (10) day extension, from June 4, 2020 until June 15, 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 fifth 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 four 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 will file the petition for writ of certiorari in the case of Christian Rollins v. The State on June 9, 2020 with the Supreme Court. Counsel will file the petition for writ of certiorari in the

case of Sylvester Johnson v. The State on June 9, 2020 with the Supreme Court. Counsel will file the return to petition for writ of certiorari in the case of Marie Faltas v. The State on June 9, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of John Haynes v. The State on May 14, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Dashon Garner v. The State on May 26, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of John Haynes v. The State on May 14, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of Dashon Garner v. The State on May 26, 2020 with the Supreme Court. Counsel filed the petition for writ of certiorari in the case of John Haynes v. The State on May 14, 2020 with the Supreme Court. 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.

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.

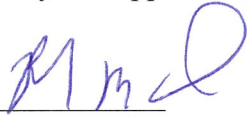
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through June 30, 2020.

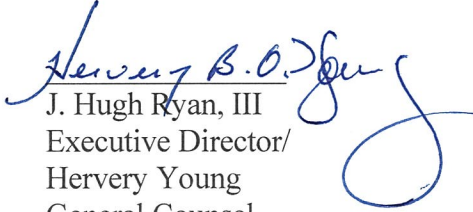
WHEREFORE, the undersigned counsel would respectfully request a **final ten (10) day extension** from June 4, 2020 until June 15, 2020, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

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

Attorney for Appellant

  
Robert M. Dudek  
Chief Appellate Defender

  
J. Hugh Ryan, III  
Executive Director/  
Hervery Young  
General Counsel

This 4th day of June, 2020.