

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County
Eugene C. Griffith, Circuit Court Judge

RECEIVED
Jul 29 2020
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

KIERIN MARCELLUS DENNIS,

APPELLANT

Appellate Case No. 2019-001486

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

The undersigned counsel respectfully requests a thirty-day extension from July 29, 2020 until August 28, 2020, 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, July 29, 2020.

2. Counsel is lead counsel in and presently working on the death penalty case of State v. Timothy Jones Jr, where the transcripts are 7,422 pages long. Counsel filed the brief of appellant and designation of matter in the case of The State v. Jason Carlton Booth with this Court on July 27, 2020. Counsel filed the Brief of Respondent in the case of The State v. Joseph Bowers with the Supreme Court on July 22, 2020. Counsel filed the petition for writ of certiorari to this Court and

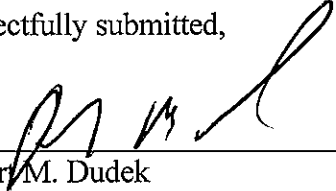
accompanying appendix in the case of The State v. Justin Jamal Warner with the Supreme Court on July 20, 2020. Counsel filed the initial brief of appellant and designation of matter in the death penalty case of The State v. Jerome Jenkins, Jr. with the Supreme Court on July 13, 2020 with co-counsel Kathrine Hudgins and Adam Ruffin. Counsel filed the petition for rehearing in the case of The State v. Arsenio D. Colclough with this Court on June 25, 2020. Counsel filed the petition for writ of certiorari to this Court and accompanying appendix in The State v. Timiya Rashad Massey with the Supreme Court on June 24, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Malette Denise Kimbrough with this Court on June 23, 2020. Counsel filed the brief of appellant and designation of matter in the case of The State v. Brian David Walls with this Court on June 18, 2020. Counsel had a WebEx oral argument before this Court on June 3, 2020 in The State v. John Ernest Perry. Counsel filed the brief of appellant and designation of matter in the case of The State v. Gabriel Joyner with this Court on May 29, 2020. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training four less experienced appellate defenders and reviewing all their filings in advance.**

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. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the extended thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through July 31, 2020. That extended, emailed general consent was dated June 23, 2020.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension from July 29, 2020 until August 28, 2020. 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,



Robert M. Dudek
Chief Appellate Defender

This 29th day of July, 2020

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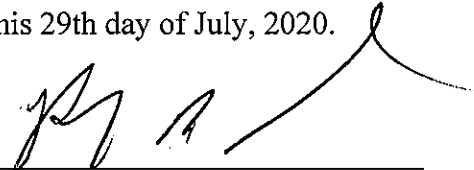
KIERIN MARCELLUS DENNIS,

APPELLANT

APPELLATE CASE NO. 2019-001486

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 initial brief of appellant and designation of matter in the above-referenced case has been served upon Melody J. Brown, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), this 29th day of July, 2020.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR APPELLANT.