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Aug 26 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Georgetown County
Honorable Kristi F. Curtis, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

MARISSA COHEN,

APPELLANT

APPELLATE CASE NO. 2020-000134

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 petition for rehearing in the case of The State of South Carolina v. Michael N. Frasier, Jr. with this Court on August 13, 2020. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Courtney Brock with this Court on August 11, 2020. Counsel filed the petition for rehearing in the case of The

State of South Carolina v. Steven Barnes with this Court on August 6, 2020. Counsel filed the petition for rehearing in the case of The State of South Carolina v. Johnathan Green with this Court on August 5, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Earnest Allen v. The State of South Carolina with the Supreme Court on July 16, 2020. Counsel filed the brief of petitioner in the case of The State of South Carolina v. Timothy L. Frady with this Court on July 16, 2020. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Brenda Roberts v. The State of South Carolina with the Supreme Court on June 29, 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.

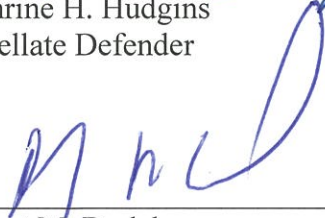
4. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through August 31, 2020. That emailed general consent was dated July 30, 2020.

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,



Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 26th day of August, 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, Esquire at the primary e-mail address listed in the Attorney Information System (AIS), this 26th day of August, 2020.


Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR APPELLANT