

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Sep 28 2020

SC Court of Appeals

Appeal from Horry County

Honorable Steven H. John, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JOHNATHAN RAKIM BRIGHT,

APPELLANT

APPELLATE CASE NO. 2020-000076

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

Counsel for Johnathan Rakim Bright respectfully requests an extension of a **final thirty (30) days, until October 28, 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 Johnathan Rakim Bright 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 initial brief of appellant and designation of matter in the case of Sidney Moorer v. The State with the Court of Appeals on September 25, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shakeia Butler v. The State with the Supreme Court on September 9, 2020. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roosevelt Sabb v. The State with the Supreme Court on September 8, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Jordan Hodge v. The State with the Court of Appeals on September 8, 2020. Counsel filed the petition for rehearing in the case of Justin Hillerby v. The State with the Court of Appeals on September 3, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Linen with the Court of Appeals on August 27, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Robert Garrett with the Court of Appeals on August 21, 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.

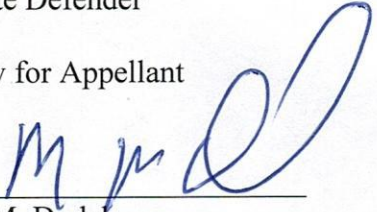
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through September 30, 2020.

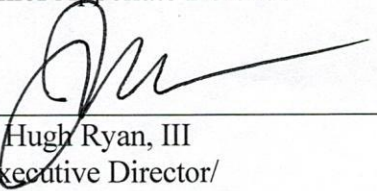
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) days, until October 28, 2020** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

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/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 28th day of September, 2020.