

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Oct 09 2020

SC Court of Appeals

Appeal from Charleston County

Honorable R. Markley Dennis, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

DAQUAN JAVOR CRUMMEY,

APPELLANT

APPELLATE CASE NO. 2020-000537

MOTION 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 writ of certiorari and accompanying appendix in the case of Johnathon Phillips v. The State with the Supreme Court on October 5, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of Sidney Moorner v. The State with this Court on October 5, 2020. Counsel attended the Annual Public Defender Conference from Monday, September 21- Wednesday, September 23, 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 this Court on September 8, 2020. Counsel filed the petition for rehearing in the case of Justin Hillerby v. The State with this Court 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 this Court 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 this Court on August 21, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Miranda Taylor with the Court of Appeals on August 19, 2020. Counsel filed the return to petition for writ of certiorari to the court of appeals in the case of Michael Elders v. The State with the Supreme Court on August 10, 2020. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Miranda Taylor with the Court of Appeals on August 7, 2020.

3. This request is made in good faith, and not for purposes of delay.

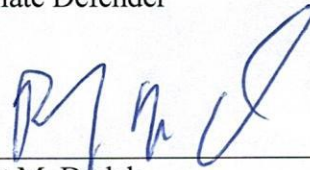
4. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through October 31, 2020.

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,

s/Taylor D. Gilliam

Taylor D. Gilliam  
Appellate Defender

A handwritten signature in blue ink, appearing to read 'R. M. Dudek', is written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

October 9, 2020