

RECEIVED

Jan 04 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Certiorari to Charleston County

Honorable Maite Murphy, Circuit Court Judge

DALE GOULD,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER.

APPELLATE CASE NO. 2018-000876

MOTION FOR AN EXTENSION OF TIME
TO FILE THE BRIEF OF RESPONDENT

Counsel for Dale Gould respectfully requests an extension of thirty (30) days in which to file the brief of respondent in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The brief of respondent is due to be served and filed with the Court today.
2. On December 17, 2020, counsel, along with co-counsel, filed the initial brief of appellant and designation of matter in The State v. Walter Murrey with the Court of Appeals. On December 10, 2020, counsel filed the brief of petitioner in James Johnson v. The State with the Court of Appeals. On December 4, 2020, counsel filed the petition for writ of certiorari and

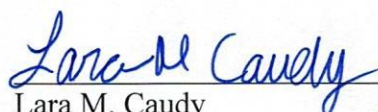
accompany appendix in Michael D. Williams v. The State with the Supreme Court. On November 12, 2020, counsel filed the brief of appellant and designation of matter in The State v. Joey Coleman with the Court of Appeals. On November 9, 2020, counsel filed the petition for writ of certiorari and accompanying appendix in Keith Tate v. The State with the Supreme Court.

3. Counsel makes this request in good faith and not for purpose of delay.

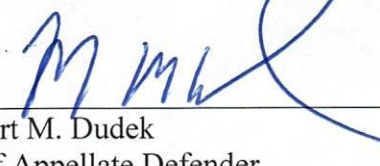
4. On December 21, 2020, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through January 31, 2021.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, in which to file the brief of respondent in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 4th day of January, 2021.

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Jan 04 2021
SC Court of Appeals

Certiorari to Charleston County

Honorable Maite Murphy, Circuit Court Judge

DALE GOULD,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER.

APPELLATE CASE NO. 2018-000876

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 to File the Brief of Respondent in the above referenced case has been served upon Megan Harrigan Jameson, Esquire at the primary e-mail address listed in the Attorney Information System (AIS), this 4th day of January, 2021.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR RESPONDENT