

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Certiorari to Charleston County
Honorable Maite Murphy, Circuit Court Judge

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Feb 03 2021
SC Court of Appeals

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

The undersigned counsel respectfully requests a thirty day extension in which to file the brief of respondent in the above referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

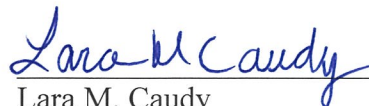
1. The brief of respondent in this case is due to be served and filed today.
2. On February 3, 2021, counsel had an oral argument in The State v. Jonathan Donell Rhodes before the Supreme Court. On January 27, 2021, counsel filed the petition for writ of certiorari and accompany appendix in Willie Thomas Starnes v. The State with the Supreme Court. On January 12, 2021, counsel, along with co-counsel, filed the initial brief of appellant and designation of matter in The State v. Kierin Dennis with the Court of Appeals. 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. Counsel makes this request in good faith and not for purpose of delay.

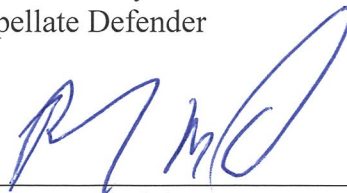
3. On January 26, 2021, opposing counsel, the Attorney General's Office, graciously consented to this extension request by way of general consent granted in writing, by Deputy Attorney General Donald J. Zelenka for all Appellate Defense extensions through January 28, 2021.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension. Counsel respectfully requests that the time limits for filing the brief of respondent be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara M. Caudy
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

February 3, 2021

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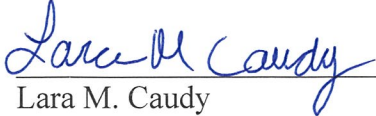
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CERTIFICATE OF SERVICE

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 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 3rd day of February, 2021.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR RESPONDENT