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APR 01 2013
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Greenville County

Edward W. Miller, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JACQUELINE YVETTE SULLIVAN,

APPELLANT

Appellate Case No. 2012-212562

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

Counsel for Jacqueline Y. Sullivan petitions the Court for a **final thirty day extension, until May 1, 2013** in which to file the initial brief of appellant and designation of matter in this case. In support of this petition, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. This is the fifth extension for Ms. Sullivan.
2. Counsel for Ms. Sullivan respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Larry Bradley Brayboy in the Supreme Court on Wednesday,

March 27, 2013. Counsel also filed the petition for writ of certiorari and accompanying appendix in the case of State v. Danny Ryant in the Supreme Court and Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Marion Stewart in the Supreme Court. Counsel filed the brief of appellant pursuant to White v. State in State v. Jamal Lindsey in the Court of Appeals on March 21, 2013; counsel also filed the petition for writ of certiorari and accompanying appendix in the case of State v. Jamal Lindsey in the Supreme Court. Counsel filed the Anders brief of appellant and record on appeal in the case of Scott Lee v. State in this Court on Wednesday, March 13, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. John B. Campbell in the Supreme Court on Monday, March 11, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case of Allen Worthy v. State in this Court on Friday, March 8, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Shazjuan S. Shabazz v. State in the Supreme Court on Friday, March 1, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Joseph Lathan Kelly in this Court. Counsel filed the Anders brief of appellant and record on appeal in the case State v. Jakevian Pulley in this Court on Wednesday, February 27, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Julio Angelo Hunsberger in this Court on Friday, February 22, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Herman Donald McKnight v. State in the Supreme Court on Tuesday, February 19, 2013. Counsel filed the brief of petitioner in the case of In the Interest of Cleo B., in this Court on Thursday, February 14, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case of Victor Smith v. State in this Court on Monday, February 11, 2013. Counsel filed the

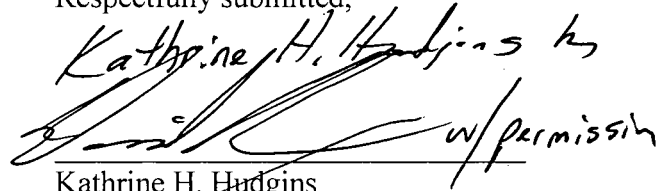
initial brief of appellant in the case of Clarence J. Fishburne v. State in this Court on Monday, February 11, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case State v. Edward Martin Clarkson in this Court on Thursday, February 7, 2013. Counsel filed the brief of petitioner in the case of Roderick Bradley v. State in this Court on Thursday, February 7, 2013. Counsel had an oral argument in the case of State v. Craig Keeling in this Court on Tuesday, February 5, 2013. Counsel filed the brief of petitioner in the case of Thomas McCall v. State in this Court on February 4, 2013. On January 30, 2013, Counsel had to appear in PCR Court in Lexington County as a witness in Frank Tolen v. State. Counsel filed the initial brief of appellant in State v. Anthony Rodrickus Carter in this Court. Counsel filed the brief of appellant pursuant to White v. State in State v. Ronald Black in this Court on January 28, 2013.

4. 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.

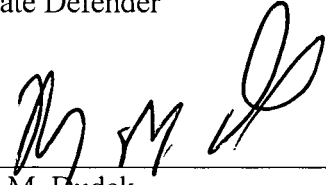
5. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until May 1, 2013**. 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.

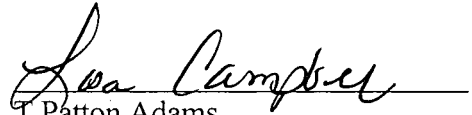
Respectfully submitted,

Kathrine H. Hudgins
 w/permission

Kathrine H. Hudgins
Appellate Defender

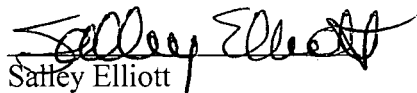


Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director
J. Hugh Ryan, III
General Counsel

April 1, 2013
I do not oppose:


Saffey Elliott



SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

ORIGINAL

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Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

April 1, 2013

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SC COURT OF APPEALS

The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Dear Ms. Kitchings:

In absence of Hugh Ryan, Deputy Attorney and General Counsel for the South Carolina Commission on Indigent Defense, and Patton Adams, Executive Director of the South Carolina Commission on Indigent Defense, and pursuant to instructions from Mr. Ryan, I ask that you accept this cover letter as an attempt to comply with the Court's order dated March 18, 2009, in regard to extension requests.

In the attached motion for an extension of time, Appellate Defender, Kathrine H. Hudgins, seeks a thirty day extension of time to file the initial brief of appellant and designation of matter. Based on that and his extremely heavy case load, as outlined in the motion, he was unable to complete the petition for writ of certiorari and accompanying appendix.

Thank you for allowing me to bring this to your attention. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Lisa Campbell

Lisa Campbell

Assistant Director

South Carolina Commission on
Indigent Defense