

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Richland County

G. Thomas Cooper, Circuit Court Judge

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THE STATE,

RESPONDENT,

V.

EDWARD M. DUNN,

APPELLANT

APPELLATE CASE NO 2012-212242

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PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER

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The undersigned counsel respectfully requests a **final thirty day extension, until May 10, 2013**, 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 is currently working on a **death penalty case** in Marion Bowman v. State. Counsel is currently working on a Petition for Writ of Certiorari to be filed with the United States Supreme Court in the case of Danny Brown v. State of South Carolina. On Monday April 8 2013, counsel filed the initial brief of appellant and designation of matter In the interest of Bryson W.. A

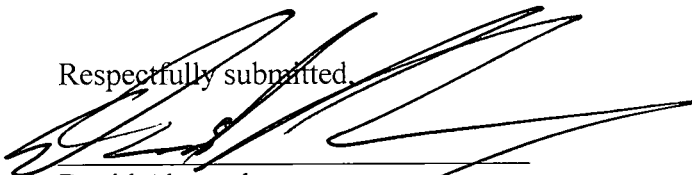
Minor in this Court. On Thursday, April 4, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Angel Gonzales v. State. On Monday, March 25, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffery Augustine v. State in the Supreme Court. On Friday, March 22, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Boyce Lee Nesbitt v. State in the Supreme Court. On Thursday March 21, 2013, counsel filed the initial brief of appellant and designation of matter in State v. In the interest of Tyairy G., A Minor in this Court. On Friday, March 15, 2013, counsel filed the brief of appellant and record on appeal in State v. Antwon Byars in this Court. Counsel also filed the initial brief of appellant and designation of matter in State v. Henry Gray in this Court. On Monday, March 11, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian A. Allen v. State in the Supreme Court. Wednesday, March 6, 2013, counsel filed the brief of appellant and record on appeal in State v. Kurt Kalani Sparks in this Court. On Friday, March 1, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sherman Dewalt v. State in the Supreme Court. On Thursday, February 28, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenneth Lee Huckabee v. State in the Supreme Court. On Wednesday, February 27, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyquan Jared Jones v. State in the Supreme Court. On Friday, February 22, 2013, counsel filed the brief of appellant and record on appeal in State v. Andrew Brent Scott in this Court. On Thursday, February 14, 2013 counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brenda Gail Cutro v. State, which had an appendix of over **5,700 pages**, in this Court. On Friday, February 8, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ryan Antonio Chapman v. State in the Supreme Court. On Friday, February 8, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Lathan v. State in the Supreme Court.

3. 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.

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

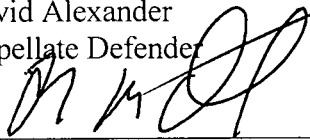
WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until May 10, 2013**. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,



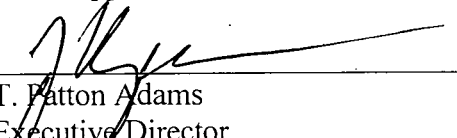
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David Alexander  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender



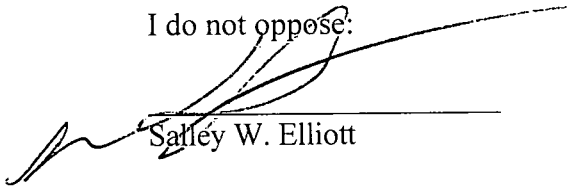
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T. Patton Adams  
Executive Director

J. Hugh Ryan, III  
General Counsel

April 10, 2013

I do not oppose:



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Salley W. Elliott