

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County

L. Casey Manning, Circuit Court Judge

RECEIVED

JUN - 6 2013

S.C. Supreme Court

DANIEL BROWN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2012-213495

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel is preparing to file the petition for rehearing in the case of State v. Jennifer Rayanne Dykes in this Court today June 6, 2013. Counsel is preparing to file the petition for writ of certiorari and accompanying appendix in the case of Stacey Abney v.

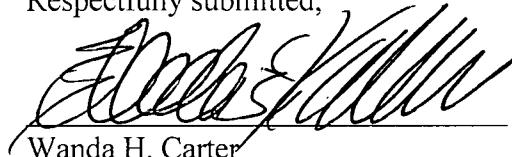
State with this Court today, June 6, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William Allen Owens v. State in this Court on June 3, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ronald Footman v. State with this Court on May 29, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Melcelus Toland v. State with this Court on May 22, 2013. Counsel filed the brief of petitioner in the case of State v. Vashaun Ravenel in this Court on May 20, 2013. Counsel had an oral argument in the case of The State v. Gerald Carlisle, Jr., in the Court of Appeals, May 7, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Christopher Less v. State of South Carolina, with this Court, on May 6, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Frank Green, Jr v. State of South Carolina with this Court on April 29, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tony Lynn v. State of South Carolina with this Court on April 29, 2013. Counsel filed the brief of respondent in the case of Ayree Henderson v. State in the Court of Appeals on April 24, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Candace Beheler with the Court of Appeals on April 24, 2013. Counsel filed the petition for rehearing in the case of State v. Curtis Gerald in the Court of Appeals on April 24, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joseph Dozier v. State with this Court on April 17, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Marques Anthony Durant v. State in this Court on April 17, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roddregus

Wells v. State with this Court on April 15, 2013. Counsel filed the record on appeal in the case of State v. Debra Newland with the Court of Appeals on April 8, 2013.

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

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Wanda H. Carter', written over a horizontal line.

Wanda H. Carter
Deputy Chief Appellate Defender

June 6, 2013

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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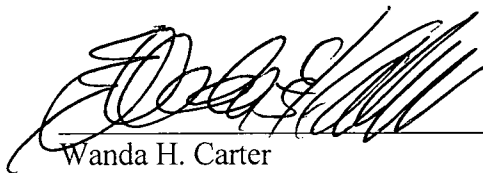
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE


The undersigned attorney hereby certifies the petition in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Megan Harrigan Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 6th day of June, 2013.



Wanda H. Carter
Deputy Chief Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
This 6th day of June, 2013.



Notary Public for South Carolina (L.S.)
My Commission Expires: November 16, 2022.