

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Georgetown County

Steven H. John, Circuit Court Judge

RECEIVED

JUN 24 2013

S.C. Supreme Court

RONALD COHEN,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

Appellate Case No. 2012- 212923

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

The undersigned counsel respectfully requests a **final thirty day extension, until July 24, 2013**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Miller with the Court of Appeals on June 19, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Benjamin Davis

v. State of South Carolina with this Court on June 19, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derek S. Carter v. State of South Carolina with this Court on June 14, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Carlos Lamonte McJimpsey with the Court of Appeals on June 12, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Taurus L. Thompson with the Court of Appeals on June 12, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. James Tyner with the Court of Appeals on June 7, 2013. Counsel had an oral argument in the case of The State v. David Tyre in the Court of Appeals on June 5, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Bobby M. Shaw v. The State with this Court on June 5, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Curtis McKie with the Court of Appeals on May 29, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Andre Green with the Court of Appeals on May 28, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jamario Q. Jones with the Court of Appeals on May 20, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Antonio Lee Dodd with the Court of Appeals on May 16, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Erick E. Hewins in the Court of Appeals on May 13, 2013. Counsel had an oral argument in the case of State v. Michael Avery Humphrey in the Court of Appeals on May 8, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Marcus Daniel Allison in the Court of Appeals on May 6, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of and Gary Waiters v. State in this Court on May 2, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Mable

Lee-Bey v. State in this Court on May 1, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jerry Whitfield v. State in this Court on April 24, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Donald Anderson in the Court of Appeals on April 19, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric LaGeorge Mouzon v. State in this Court on April 16, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Little Johnny Lee Mackey v. State in this Court on April 12, 2013.

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

5. 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.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until July 24, 2013**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Carmen V. Ganjehsani
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

June 24th, 2013

I do not oppose:



Tyson Andrew Johnson, Sr.