

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Marlboro County  
J. Michael Baxley, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

JUL 10 2013

S.C. Supreme Court

KEENA L. RIVERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000476

\_\_\_\_\_  
MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX  
\_\_\_\_\_

Counsel for Keena L. Rivers respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Keena L. Rivers respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions

previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

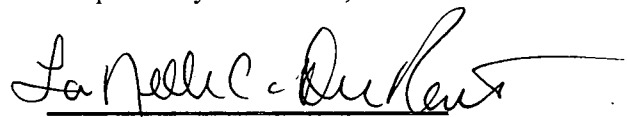
3. Counsel is filing today the initial brief of appellant and designation of matter in the case The State v. of Keeon Butler with the Court of Appeals. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Stanley Bradley v. State of South Carolina with this Court on July 8, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Roderick Pope, with the Court of Appeals on July 2, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Christopher Dean Johnson v. State of South Carolina with this Court on July 2, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Christopher Dale Shirley v. State of South Carolina with this Court on July 2, 2013. Counsel filed the petition for rehearing in the case of The State v. Daniel Rogers with the Court of Appeals on June 27, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Michael Dover v. The State with this Court on June 27, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Jimmy Lee Sessions with this Court on June 19, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Demetrius Goodwin with this Court on June 19, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Bobby J. Barton with this Court on June 19, 2013. Counsel had an oral argument in the case of The State v. Christopher Taft, in the Court of Appeals on June 13, 2013. Counsel had an oral argument in the case of The State v. John Peter Barnes, in the Court of Appeals on June 13, 2013. Counsel had an oral argument in the case of The State v. Kenneth S. Bolden, in 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. Douglas M. 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. Ontaney V. Jackson with the Court of Appeals on May 31, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Kareem J. Leaphart v. State of South Carolina with this Court on May 30, 2013. Counsel filed the brief of respondent in the case of The State v. Phillips Wesley Sawyer with this Court on May 30, 2013. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. Ralph Bernard Coleman with this Court on May 23, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Titus Bantan v. State of South Carolina with this Court on May 23, 2013.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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 based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner

July 10<sup>th</sup>, 2013

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Marlboro County  
J. Michael Baxley, Circuit Court Judge

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KEENA L. RIVERS,

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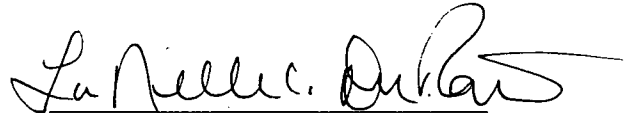
APPELLATE CASE NO. 2013-000476

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CERTIFICATE OF SERVICE

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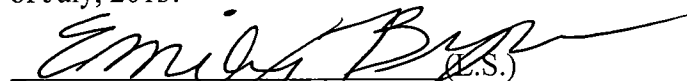
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Tyson Andrew Johnson Sr., Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 10th day of July, 2013.



LaNelle C. Durant  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 10th day  
of July, 2013.



(L.S.)

Notary Public for South Carolina

My Commission Expires: November 16, 2022.