

**ORIGINAL**

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Oconee County  
J. Cordell Maddox, Jr., Circuit Court Judge

---

**RECEIVED**

JUN 18 2012

**S.C. Supreme Court**

JAMES RANDOLPH FRADY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

---

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

---

Counsel for James Randolph Frady 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 is due to be served and filed with the Court today, June 18, 2012.
2. Counsel for Mr. Frady 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 his caseload, counsel hopes that no further extension requests will be required.
3. On June 15, 2012, counsel filed the initial brief of appellant and designation of matter in State v. Joseph Davis with the Court of Appeals. On June 14, 2012, counsel filed the Anders brief of

appellant and Record on Appeal in the case of State v. Jeffrey Riebe with the Court of Appeals. On June 7 -8, 2012, counsel attended a seminar at this Court Advocacy Institute for continuing legal education in New York, NY. On June 7, 2012, counsel had an oral argument in the case of State v. Jason Black in the Court of Appeals. On June 5, 2012, counsel had an oral argument in the case of State v. David Meggett in the Court of Appeals and filed the Anders brief of appellant and Record on Appeal in the case of State v. Marvin B. Green. On June 1, 2012, counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Murray in the Court of Appeals. On May 22, 2012, counsel had an oral argument in the case of State v. Clifford Wylie in this Court. On May 18, 2012, counsel filed the initial brief of appellant and designation of matter in State v. Tevon Jackson in the Court of Appeals.

4. Counsel makes this request in good faith and not for purpose 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. 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.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Breen R. Stevens", with a long horizontal flourish extending to the right.

Breen R. Stevens  
Appellate Defender

Attorney for Petitioner

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Certiorari to Oconee County

J. Cordell Maddox, Jr., Circuit Court Judge

---

JAMES RANDOLPH FRADY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

---

CERTIFICATE OF SERVICE

---

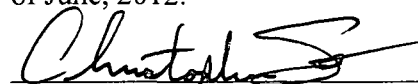
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Kaelon E. May, Esquire, this 18th day of June, 2012.



Breen R. Stevens  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18th day  
of June, 2012.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: May 16, 2012.