

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
R. Knox McMahon, Circuit Court Judge

RECEIVED

JUL 18 2013

LINWOOD CARSON,

S.C. Supreme Court

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000512

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

Counsel for Linwood Carson 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 Linwood Carson 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 filed petition for writ of certiorari in the case of Donald C. Brevard v. State of South Carolina with the Court of Appeals on July 17, 2013. Counsel filed the petition for rehearing in the case of The State v. Richard Burton Beekman with the Court of Appeals on July 11, 2013. Counsel filed the petition for rehearing in the case of The State v. David Tyre with the Court of Appeals on July 11, 2013. Counsel filed the Brief of Appellant in the case of The State v. Tina Dockery in the Court of Appeals on July 9, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Roosevelt Kadeem Workman with the Court of Appeals on July 5, 2013. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Randy Jennings v. State of South Carolina with this Court on July 5, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Forrest Kelly Samples with the Court of Appeals on June 28, 2013. 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.

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,



Carmen V. Ganjehsani
Appellate Defender

Attorney for Petitioner

July 18th, 2013

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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 Megan Harrigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18th day of July, 2013.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18th day
of July, 2013.

Maria Hunter (L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.