

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

**RECEIVED**

AUG 01 2013

Certiorari to Lee County

William Jeffrey Young, Circuit Court Judge

**S.C. Supreme Court**

EUNICE MCCALL,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case no. 2012-213542

**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 filed the Anders brief of appellant and record on appeal in the case of State v. Ryan Carl Newman with the Court of Appeals on July 30, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert Lee Nelson in the Court of Appeals on July 29, 2013. Counsel filed the petition for writ

of certiorari in the case of State v. Connie Dumas (Cert in the COA) with this Court on July 25, 2013. Counsel filed the initial reply brief of appellant in the case of State v. Alex Hunsberger with the Court of Appeals on July 25, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. John Bonner with the Court of Appeals on July 22, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Marty Baggett in the Court of Appeals on July 18, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew Fullbright with the Court of Appeals on July 16, 2013. Counsel filed the record on appeal in the case of State v. Malik Matthews in the Court of Appeals on July 11, 2013. Counsel filed the petition for rehearing in the case of State v. Bobby Alexander Gilbert in the Court of Appeals on July 11, 2013. Counsel filed the petition for writ of certiorari, the Johnson petition for writ of certiorari pursuant to Austin v. State and accompanying appendix in the case of Michael Miller v. State with this Court on July 11, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Anthony Sanders v. The State of South Carolina with this Court on July 5, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Santiago Rios v. State with this Court on June 28, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Brown v. State with this Court on June 24, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Curtis Eugene Land with the Court of Appeals on or before June 20, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jerod Swinton in the Court of Appeals on June 18, 2013. Counsel had an oral argument in the case of State v. Anthony Lounds with the Court of Appeals on June

12, 2013. Counsel had an oral argument in the case of State v. Willie Poole with the Court of Appeals on June 11, 2013. Counsel had an oral argument in the case of State v. Bobby Gilbert in the Court of Appeals on June 11, 2013. Counsel had an oral argument in the case of State v. Leslie Twyman with the Court of Appeals on June 6, 2013. Counsel had an oral argument in the case of State v. Tyrone Beaty in the Court of Appeals on June 4, 2013. Counsel had an oral argument in the case of State v. James Moore in the Court of Appeals on June 5, 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,

Susan B. Hackett

Susan B. Hackett  
Appellate Defender

August 1, 2013

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Lee County

William Jeffrey Young, Circuit Court Judge

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EUNICE MCCALL,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

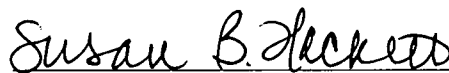
Appellate Case no. 2012-213542

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CERTIFICATE OF SERVICE

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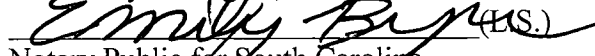
The undersigned attorney hereby certifies the petition in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Megan Harrigan, Esquire, Assistant General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 1<sup>st</sup> day of August, 2013.



Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 1<sup>st</sup> day of August, 2013.

  
Notary Public for South Carolina  
My Commission Expires: November 16, 2022.