

 ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Sumter County

**RECEIVED**

R. Ferrell, Cothran, Jr., Circuit Court Judge AUG 22 2013

\_\_\_\_\_  
**S.C. Supreme Court**

CALDERONE BRACEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-000264  
\_\_\_\_\_

**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 is preparing to file the petition for writ of certiorari and accompanying appendix in the case of Standford Brown v. State in this Court on or before August 30, 2013. Counsel filed the petition for writ of certiorari and

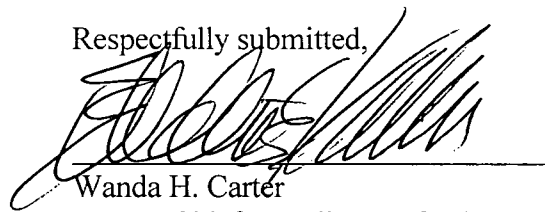
accompanying appendix in the case of Mason Johnson v. State with this Court on August 16, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Willie Green v. State in this Court on August 16, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Stanford Johnson v. State with this Court on August 13, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Daniel Brown v. State with this Court on August 7, 2013. Counsel filed the record on appeal in the case of State v. Robert Lee, Jr. with the Court of Appeals on or August 7, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Ryan Holliday with the Court of Appeals on July 29, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Willliam Laureano in the Court of Appeals on July 23, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Elizabeth Ann Tillman v. State in this Court t on July 22, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donnie Nelson v. State with this Court on July 17, 2013. Counsel filed the record on appeal in the case of State v. Candace Beheler in the Court of Appeals on July 15, 2013. Counsel had a PCR reconstruction hearing in the case of Maurice A. Kelley v State in the Richland County Courthouse on July 16, 2013. Counsel filed the record on appeal in the case of State v. Walter Goodine in the Court of Appeals on July 12, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Walter Lamont Morgan v. State with this Court on July 8, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lamont Raphael Briggs v. State in this Court on July 8, 2013. Counsel filed the initial brief of

appellant and designation of matter in the case of State v. David Vice with the Court of Appeals on July 1, 2013. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Toddrique D. Henderson with the Court of Appeals on July 1, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sylvester Boone v. State with this Court on June 28, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ashley Ray Hardin v. State with this Court on June 17, 2013.

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,



Wanda H. Carter  
Deputy Chief Appellate Defender

August 22, 2013

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Certiorari to Sumter County

R. Ferrell, Cothran, Jr., Circuit Court Judge

---

CALDERONE BRACEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

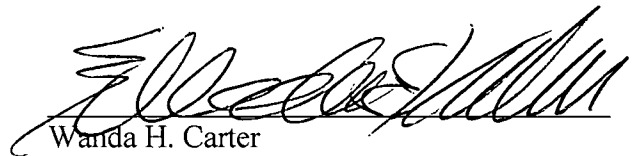
Appellate Case No. 2013-000264

---

CERTIFICATE OF SERVICE

---


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 Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 22<sup>nd</sup> day of August, 2013.



Wanda H. Carter  
Deputy Chief Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 22<sup>nd</sup> day of August, 2013.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: November 16, 2022.