

STATE OF SOUTH CAROLINA

 ORIGINAL

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Richland County

G. Thomas Cooper, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

SEP 03 2013

LEROY BROWN,

**S.C. Supreme Court**

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000498

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

Counsel respectfully requests a **final extension of thirty (30) days until October 2, 2013**, 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 third 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, September 3, 2013.

2. Counsel 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. **However, this is undersigned counsel's first extension request in this case.**

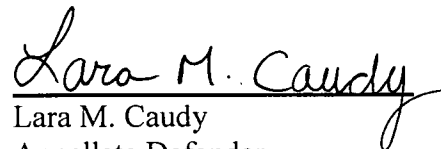
3. This case was assigned to Carmen V. Ganjehsani. Undersigned counsel has been reassigned to handle the present case, effective August 15, 2013. On August 28, 2013, counsel filed a brief of appellant and record on appeal in State v. Bobby McConnell with this Court. On August 26, 2013, counsel filed a petition for writ of certiorari and accompany appendix in Robert Earle Ricketts v. State with this Court.

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.

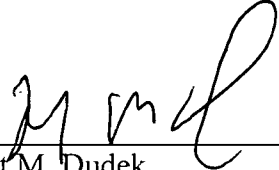
5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until October 2, 2013**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,

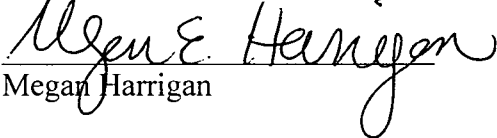
  
Lara M. Caudy  
Appellate Defender

Attorney for Petitioner

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 3rd day of September, 2013

I Consent:

  
\_\_\_\_\_  
Megan Harrigan