

 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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SEP - 5 2013

Certiorari to Greenville County

William Jeffrey Young, Circuit Court Judge **S.C. Supreme Court**

MICHAEL LEE JONES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000899

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

Counsel respectfully requests a thirty day extension **from September 9, 2013, until October 8, 2013**, in which to file the petition for writ of certiorari 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 Monday, September 9, 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.

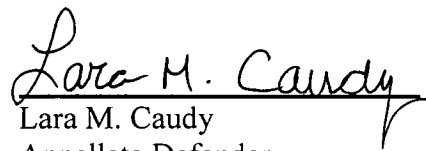
3. This case was assigned to Appellate Defender Benjamin J. Tripp. Undersigned counsel has been reassigned to handle the present case, effective August 15, 2013. On August 28, 2013, counsel filed a brief of appellant and record on appeal in State v. Bobby McConnell with this Court. On August 26, 2013, 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 has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension **from September 9, 2013, until October 8, 2013**, in which to file the petition for writ of certiorari in this case based upon the above exigent circumstances.

Respectfully submitted,


Lara M. Caudy
Appellate Defender

Attorney for Petitioner

September 5, 2013

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
William Jeffrey Young, Circuit Court Judge

MICHAEL LEE JONES,

PETITIONER,

V.

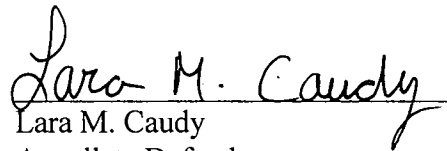
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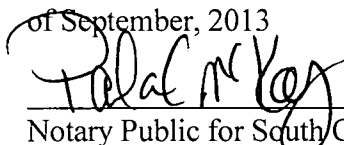
CERTIFICATE OF SERVICE

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 Karen Ratigan, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 5th day of September, 2013.


Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 5th day
of September, 2013


_____(L.S.)
Notary Public for South Carolina
My Commission Expires: July 24, 2022.