

IN THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

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Case No. 09-CP-23-0741  
Appellate Case No. 2013-001026

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Freddie Eugene Owens, #5065,

v.

State of South Carolina.

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S.C. SUPREME COURT

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**PETITIONER'S MOTION FOR EXTENSION  
OF TIME TO FILE APPENDIX AND PETITION  
FOR WRIT OF CERTIORARI**

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Petitioner, Freddie Eugene Owens, through undersigned counsel, for the reasons stated below, respectfully requests that this Court grant an extension of time for 30 days to file the Petition for Writ of Certiorari and the Appendix presently due for filing on September 9, 2013. The reasons for this motion are as follows:

1. Undersigned counsel has begun work on the Petition and has compiled the necessary materials for the Appendix and provided them to the Office of Appellate Defense, which is associated for costs in this matter. ADO plans to prepare the Appendix in-house, and it is not yet complete.

2. Furthermore, Mr. Owens' case concerns complex factual and legal issues that require thorough record review, research and analysis. Undersigned counsel has been working on

a draft of the Petition, but requires additional time to complete it. Counsel has a number of other case obligations, and reasonably believes that an extension is needed to thoroughly and accurately brief the issues in this case.

THEREFORE, for the reasons stated above, petitioner respectfully submits that an extension of time is warranted for good cause and requests thirty days, thus making the Appendix and Petition for Writ of Certiorari due on October 9, 2013.

Respectfully submitted,

**EMILY C. PAAVOLA**

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BY:   
COUNSEL FOR PETITIONER

September 5, 2013

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In The Supreme Court

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Edward W. Miller, Circuit Court Judge

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**CERTIFICATE OF SERVICE**

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I, Jill Rider, hereby certify that I have served upon the attorney for the Respondent one (1) copy of Petitioner's Motion for Extension of Time to File Appendix and Petition for Writ of Certiorari in the above referenced case by depositing a copy of the same in the United States Mail, first class, postage pre-paid, addressed as follows:

J. Anthony Maybry  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

This the 5<sup>th</sup> day of September, 2013, in Columbia, SC.

  
Jill A. Rider