

ORIGINAL

STATE OF SOUTH CAROLINA

RECEIVED

IN THE SUPREME COURT

SEP 13 2013

S.C. Supreme Court

Appeal from Greenwood County

Frank R. Addy, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

ANTHONY NATION,

APPELLANT

Appellate Case No. 2011-199726

PETITION FOR EXTENSION TO FILE  
THE REPLY TO THE INITIAL BRIEF OF RESPONDENT

The undersigned counsel respectfully requests a ten-day extension in which to file the reply to the initial brief of respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The reply to the initial brief of respondent is due to be served and filed today in this case.
2. Counsel is working on and plans to file the initial brief of appellant and designation of matter in the case of State v. Michael Wright in the Court of Appeals, as well as the petition for rehearing in the case of State v. James Bethel in this Court today, September 13, 2013. Counsel filed the petitions for rehearing in the cases of State v. Anthony Wade and State v. Alton Shelley in this Court yesterday, September 12, 2013. Additionally, Counsel filed the

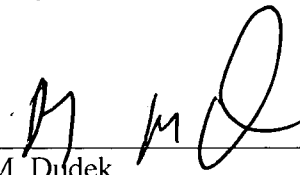
petition for writ of certiorari and accompanying appendix in the **death penalty** case of State v. Brad Keith Sigmon in the United States Supreme Court yesterday, September 12, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. John L. Hogan in the Court of Appeals on September 4, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Victor Weldon in the Court of Appeals on August 28, 2013. Counsel is also working on the case of Marion Bowman v. State, a **death penalty** case in this Court with a 10,000 page appendix. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Charles M. Harris in the Court of Appeals on August 14, 2013. Counsel filed both the initial brief of appellant and designation of matter, and the initial brief of respondent and designation of matter, in the cross-appeal case of State v. Anthony Blakney in the Court of Appeals on August 7, 2013. Counsel filed the initial brief of appellant (three issue merits brief) and designation of matter in the case of State v. Jason Bauman in the Court of Appeals on August 2, 2013. Counsel filed a petition for writ of habeas corpus in this Court's original jurisdiction and accompanying appendix with Co-Counsel David Alexander and Susan Hackett in the case of State v. Curtis Simms in this Court on August 1, 2013. Counsel went to Allendale Correctional Institution to meet with Juan Orozco regarding the case of State v. Juan Orozco in this Court on July 31, 2013. Counsel filed the brief of petitioner in the **death penalty** case of John Edward Weik v. State in this Court on July 30, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Antonio Thomas in the Court of Appeals on July 24, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert Wayne Mitchell in the Court of Appeals on July 19, 2013. Counsel filed the initial brief of appellant and designation of matter in the murder case of State v. Edward W. Stackhouse, as well as the petition for rehearing in the case of State v. Manuel Antonio Marin, with Co-Counsel David Alexander, both 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. Richey Lamont Boyd in the Court of Appeals on July 12, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the **death penalty** case of State v. Stephen Stanko in the United States Supreme Court on July 2, 2013. **Counsel also has extensive administrative duties as the Chief Appellate Defender.**

3. This request is made in good faith, and not for purposes 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.

WHEREFORE, the undersigned counsel would respectfully request a ten-day extension. Counsel respectfully requests that the time limits for filing the reply to the initial brief of respondent be held in abeyance pending a ruling on this motion.

Respectfully submitted,

By:   
Robert M. Dudek  
Chief Appellate Defender

E. Charles Grose, Jr.  
Chief Circuit Public Defender, Eighth Circuit

Shane E. Goranson  
Assistant Public Defender, Eighth Circuit

September 13, 2013

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from Greenwood County

Frank R. Addy, Circuit Court Judge

THE STATE,

RESPONDENT,

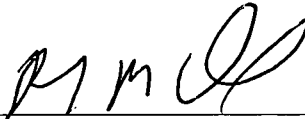
V.

ANTHONY NATION,

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CERTIFICATE OF SERVICE

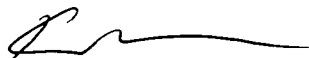
The undersigned attorney hereby certifies that a true copy of the petition for extension to file the reply to the initial brief of respondent in the above referenced case has been served upon Matthew Buchanan, Esquire, at the South Carolina Department of Probation, Parole & Pardon Services, PO Box 50666, Columbia, SC 29250, this 13th day of September, 2013.



Robert M. Dudek  
Chief Appellate Defender

ATTORNEY FOR APPELLANT.

SUBSCRIBED AND SWORN TO before me  
this 13th day of September, 2013.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: August 21, 2023 .