

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Georgetown County

Benjamin H. Culbertson, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

SEP 19 2013

S.C. Supreme Court

GARY L. HAYES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-001326  
\_\_\_\_\_

**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 filed the petition for writ of certiorari and accompanying appendix in the case of Terrence Black v State in this Court on September 19, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of

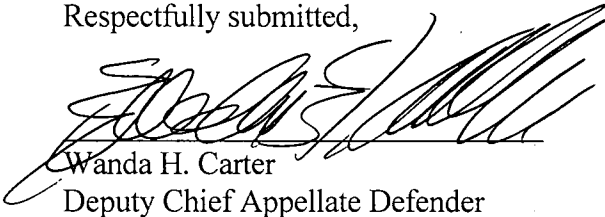
Michael Odom v State in this Court on September 19, 2013. Counsel filed the Petition for writ of certiorari and accompanying appendix in the case of Reginald Barno v. State in this Court on September 16, 2013. Counsel filed the Petition for writ of certiorari and accompanying appendix in the case of Kevis Lavor Lee v. State in this Court on September 11, 2013. Counsel filed the brief of petitioner in the case of Steve Bagwell v. State in the Court of Appeals on September 6, 2013. Counsel filed the Petition for writ of certiorari and accompanying appendix in the case of Gerald L. Gantt v. State in this Court on September 5, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Patrick Spigner v. State in this Court on September 3, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Standford Brown v. State in this Court 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. William 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 on July 22, 2013.

3. 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

September 19, 2013

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Georgetown County  
Benjamin H. Culbertson, Circuit Court Judge  
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GARY L. HAYES,

PETITIONER,

V.

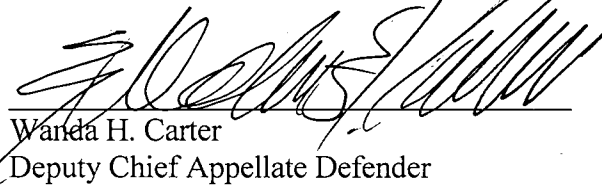
STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-001326

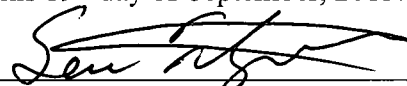
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CERTIFICATE OF SERVICE  
\_\_\_\_\_

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 Andrew Johnson, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 19<sup>th</sup> day of September, 2013.

  
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Wanda H. Carter  
Deputy Chief Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 19<sup>th</sup> day of September, 2013.

  
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(L.S.)  
Notary Public for South Carolina  
My Commission Expires: October 30, 2022.