

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

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

Freddie Eugene Owens, #5065, Petitioner,

v.

State of South Carolina, Respondent.

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OCT 08 2013

S.C. SUPREME COURT

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

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 October 9, 2013. The reasons for this motion are as follows:

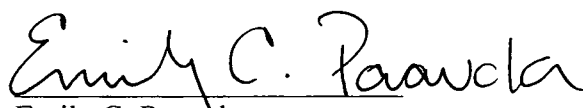
1. Undersigned counsel has a draft of the Petition in progress and has compiled the necessary materials for the Appendix and provided them to the Office of Appellate Defense, which is associated for costs in this matter. In the past thirty days, however, undersigned counsel has also been responsible for drafting a proposed order for a capital PCR in *Simmons v. South Carolina*. Counsel also filed a federal habeas petition in another capital case, *John R. Wood v. Byars*, and has been conducting investigation and making hearing preparations for *William Bell v. South*

Carolina, also a capital PCR. Moreover, undersigned counsel just received the completed Appendix from ADO in this matter, and counsel reasonably requires additional time to finalize the Petition and provide appropriate citations to the newly completed Appendix.

2. Finally, Mr. Owens' case concerns complex factual and legal issues that require thorough record review, research and analysis. Undersigned 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 or before November 8, 2013.

Respectfully submitted,


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October 7, 2013

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In The Supreme Court

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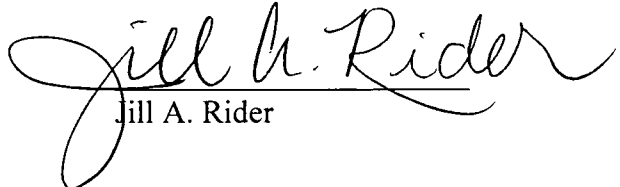
v.

State of South Carolina, Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Petitioner's Motion for Extension of Time to File Appendix and Petition for Writ of Certiorari was served by first class United States mail, postage prepaid, this 7th day of October, 2013, upon the following:

J. Anthony Mabry
Assistant Attorney General
P.O. Box 11549
Columbia, SC 29211


Jill A. Rider