

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County

Clifton Newman, Circuit Court Judge

RECEIVED

OCT 14 2013

S.C. Supreme Court

JEFFERY T. LUCAS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000455

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final eighteen-day extension, until November 1, 2013**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully inform the Court that he is working on the petition for certiorari in the capital PCR of Marion Bowman v. State, **which is due on its final extension in this Court on October 18, 2013**. Counsel plans to work on this case immediately after completing this capital PCR petition, in which the record exceeds 10,000 pages. Counsel would also show the following extraordinary circumstances, **his wife gave birth to counsel's second child on September 30, 2013, and in mid-September, counsel tore ligaments in his foot. Counsel will file the brief with this Court, if possible, earlier than the eighteen**

(18) day extension requested, and Counsel has discussed the number of extensions in this case with Chief Appellate Defender, Robert Dudek. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009.

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

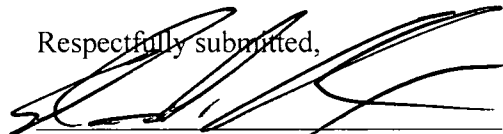
2. Counsel is currently working on a death penalty case in Marion Bowman v. State, in which the appendix is over **10,000** pages and which is due on its final extension October 18, 2013. Counsel filed the initial reply brief of appellant in the case of State v. Edward M. Dunn in the Court of Appeals on Friday, September 27, 2013. Counsel attended the Public Defender Conference in Myrtle Beach, South Carolina on September 23rd, 24th, and 25th of 2013. Counsel filed the petition for rehearing in this Court in Richard Sims v. State on Friday, September 20, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Harry Anthony in the Court of Appeals on Tuesday, September 10, 2013. Also on Tuesday, September 10, 2013 Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Watson v. State in this Court. Counsel filed the reply to the return to the petition for writ of certiorari in this Court in Brenda Gail Cutro v. State on September 3, 2013. Counsel filed the petition for rehearing in the Court of Appeals in State v. Darren Scott on August 29, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis Parker v. State in this Court on Tuesday, August 27, 2013. Counsel filed the brief of appellant and record on appeal in State v. Jeff Chestnut in the Court of Appeals on Tuesday, August 20, 2013. Counsel filed the initial reply brief in the case of State v. Steven Kranendonk in the Court of Appeals on Monday, August 19, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Robert Brown v. State in this Court

on Friday, August 16, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darrell Brown v. State in this Court on Tuesday,

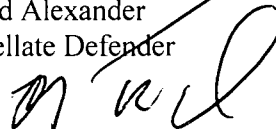
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until November 13, 2013**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

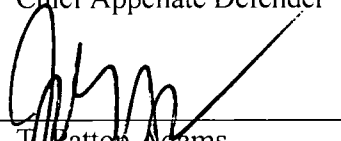
Respectfully submitted,



David Alexander
Appellate Defender



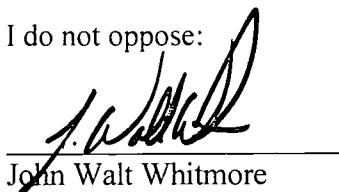
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director
J. Hugh Ryan, III
General Counsel

October 14, 2013

I do not oppose:



John Walt Whitmore