

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Richland County  
Alison Renee Lee., Circuit Court Judge

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**RECEIVED**

OCT 30 2013

**S.C. Supreme Court**

ERIC MANCE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-001039

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX

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Counsel for Eric Mance respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Eric Mance respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions

previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

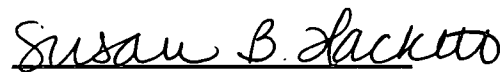
3. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Louis Gainey v. State in this Court on October 29, 2013. Counsel participated in a Reconstruction Hearing in the case of State v. Jimmy Lee Duncan in Colleton County on October 25, 2013. Counsel filed the final brief of appellant in the Court of Appeals in the case of State v. Clarence W. Jenkins on October 21, 2013. Counsel filed the final brief of appellant in this Court in the case of State v. Tavario Dormell Brunson on October 17, 2013. Counsel filed the initial brief of appellant in the Court of Appeals in the case of State v. Marvin Bowens Green on October 16, 2013. Counsel filed the initial reply brief in the Court of Appeals in the case of State v. Douglas Bishop on October 15, 2013. Counsel argued in the Court of Appeals in the case of State v. Julia Gorman on October 9, 2013. Counsel filed the final brief of appellant in the Court of Appeals in the case of State v. Jerod Swinton on October 9, 2013. Counsel argued in reply an Oral Argument in this Court in the case of State v. Desmond Sams on October 2, 2013. Counsel filed a motion for reconstruction in the Court of Appeals in the case of State v. Michael Hockaday on October 2, 2013. Counsel filed the final brief of appellant in the case of State v. Lamar D. Williams on October 1, 2013 in the Court of Appeals. Counsel filed the final brief of appellant in the case of State v. Jeffrey D. Thomas on October 1, 2013 in the Court of Appeals. On September 20, 2013, counsel attended a conference hosted by the South Carolina Commission on Indigent Defense entitled Gideon at 50 in Charleston, S.C. On September 23-25, 2013 counsel attended the 2013 Public Defender Conference in Myrtle Beach, S.C. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Darryl Drayton on September 19, 2013. Counsel filed a petition for rehearing in the case of State v. Anthony T.

McWilson in this Court on September 13, 2013. Counsel filed a petition for rehearing in the case of State v Thomas Smith in the Court of Appeals on September 12, 2013. Counsel filed the final brief of appellant in the case of State v Alexander L. Hunsberger in the Court of Appeals on September 10, 2013. Counsel filed a brief of appellant and record on appeal in the case of State v. Braquette Wykina Walton in the Court of Appeals on September 5, 2013.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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 based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
Susan B. Hackett  
Appellate Defender

Attorney for Petitioner

October 30, 2013

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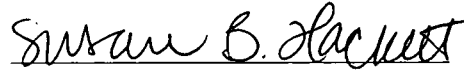
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CERTIFICATE OF SERVICE

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I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Megan Harrigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 30th day of October, 2013.



Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 30th day  
of October, 2013.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: October 30, 2022.