

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

DEC 27 2013

Certiorari to Spartanburg County
Roger L. Couch, Circuit Court Judge

S.C. Supreme Court

ASHLEY EUGENE MOORE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002309

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

Counsel for Ashley E. Moore respectfully requests an extension of thirty (30) days in which to file the return to the petition for writ of certiorari 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 return to the petition for writ of certiorari are due to be served and filed with the Court today.
2. Counsel for Ashley E. Moore 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 the initial brief of appellant and designation of matter in the case of The State v. Melvin Haynes with the Court of Appeals on December 18, 2013. Counsel filed the petition for writ of certiorari in the case of Stephen Corley v. State of South Carolina with this Court on December 6, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Maurio Daetrel Rivers with the Court of Appeals on November 27, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shondray Lamont Martin v. State of South Carolina with this Court on November 25, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Richard Beekman with this Court on November 22, 2013. Counsel filed the brief of petitioner in the case of The State v. Nathaniel Murray with this Court on November 20, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Willie Pelzer v. State of South Carolina with this Court on November 18, 2013. Counsel filed the reply to the return to the petition for writ of certiorari to the Court of Appeals in the case of The State v. Derek S. Carter with this Court on November 12, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. David Tyre with this Court on November 8, 2013. Counsel filed the initial brief of appellant in the case of The State v. Fred Woodrow Cribb with the Court of Appeals on November 6, 2013. Counsel filed the initial reply brief of appellant in the case of The State v. Christopher Miller with the Court of Appeals on October 31, 2013. Counsel attended and participated in the CLE Seminar regarding the Presentation of Criminal Appeals to the Court of Appeals on October 24, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Orlando Shiver v. State of South Carolina with this Court on October 23, 2013. Counsel filed the initial brief of appellant and

designation of matter in the case of The State v. Elizabeth M. Dinkins with the Court of Appeals on October 18, 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 return to the petition for writ of certiorari in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the return to the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Carmen V. Ganjehsani
Appellate Defender

Attorney for Petitioner

December 27th, 2013

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STATE OF SOUTH CAROLINA,

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CERTIFICATE OF SERVICE

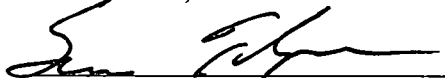
I certify that a true copy of the motion for an extension of time in which to file the return to the petition for writ of certiorari in the above case has been served upon Julie Kate Keeney, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 27th day of December, 2013.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 27th day
of December, 2013.



(L.S.)

Notary Public for South Carolina

My Commission Expires: Ocotber 30, 2022.