

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County
G. Thomas Cooper, Jr., Circuit Court Judge

RECEIVED

JAN 30 2014

S.C. Supreme Court

MARK ELLIS BROWN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-001024

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

Counsel for Mark Ellis Brown 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 Mark Ellis Brown 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.

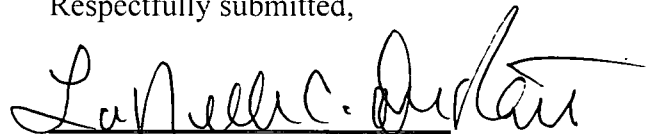
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Willie Goodwin v. State of South Carolina with this Court on January 22, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Edward Burchfield v. State of South Carolina with this Court on January 15, 2014. Counsel had a PCR hearing in the case of The State v. Daniel Rogers in Darlington County on January 14, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix and initial brief of appellant pursuant to White v. State in the case of Darren A. Simmons v. The State with this Court on January 10, 2014. Counsel had an oral argument in the case of The State v. Shawn Reaves in the Court of Appeals on January 6, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of William J. Wilde with the Court of Appeals on January 3, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John D. Garvin with the Court of Appeals on January 2, 2014. Counsel filed the brief of petitioner in the case of The State v. Jake Antonio Wilson with this Court on December 18, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tijuan Peake v. State of South Carolina with this Court on December 10, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of In The Matter of the Care and Treatment of Bobby Russell with this Court on December 10, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of In The Matter of the Care and Treatment of Christopher Taft with this Court on December 10, 2013. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. David Jakes with this Court on December 5, 2013. Counsel filed the petition for rehearing in the case of The State v. Oran Smith with the Court of Appeals on December 4, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of In the

Matter of the Care and Treatment of Richard Dean Capps with the Court of Appeals on November 25, 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,



LaNelle C. Durant
Appellate Defender

Attorney for Petitioner

January 30th, 2014

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IN THE SUPREME COURT

Certiorari to Richland County
G. Thomas Cooper, Jr., Circuit Court Judge

MARK ELLIS BROWN,

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V.

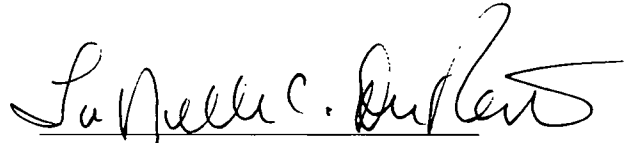
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-001024

CERTIFICATE OF SERVICE

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, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 30th day of January, 2013.



LaNelle C. Durant
Appellate Defender

ATTORNEY FOR PETITIONER

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

Leah Lunsford (L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.