

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Greenville County

G. Edward Welmaker, Circuit Court Judge  
\_\_\_\_\_

 ORIGINAL

**RECEIVED**

FEB 03 2014

**S.C. Supreme Court**

CHAVIS L. COX,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-001427  
\_\_\_\_\_

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

Counsel for Chavis Cox respectfully requests a **final thirty (30) day extension, until March 4, 2014**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.

2. Counsel for Mr. Chavis Cox 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 brief of appellant in the case of In the Matter of the Care and Treatment of Alphonso Haynesworth with the Court of Appeals on January 31, 2014. Counsel filed the petition for rehearing in the case of The State v. James A. Giles with this Court on January 30, 2014. 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

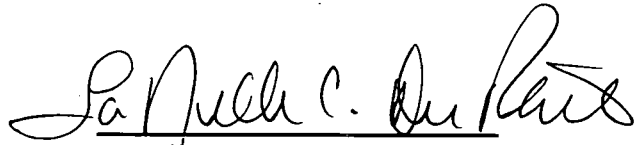
case of The State v. David Jakes with this Court on December 5, 2013. Counsel filed the petition for rehearing in the case of The State v. Oran Smith with the Court of Appeals on December 4, 2013. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Richard Dean Capps with the Court of Appeals on November 25, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shane Lamar Moore v. State of South Carolina with this Court on November 22, 2013. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Vince Neal Way in this Court on November 20, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rahim F. Carter v. State of South Carolina with this Court on November 14, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Barry Reynolds Styles v. State of South Carolina with this Court on November 7, 2013. Counsel had an oral argument in the case of The State v. Phillip Wesley Sawyer in this Court on November 5, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of In the Matter of the Care and Treatment of Timothy Geter with this Court on November 4, 2013.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 4, 2014**, 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

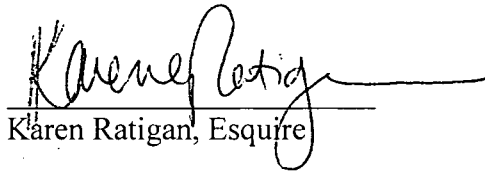
Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 3rd day of February, 2014

I consent:



Karen Ratigan, Esquire