

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Anderson County  
R. Lawton McIntosh, Circuit Court Judge

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**RECEIVED**

FEB 18 2014

**S.C. Supreme Court**

SHAWN WILLIAMS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-001697

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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 Shawn Williams 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 Shawn Williams 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 reply to the return to the petition for writ of certiorari in the case of Linwood Carson v. State of South Carolina with this Court on February 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Abraham Kelty v. State of South Carolina with this Court on February 2, 2014. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of The State v. Ashley Eugene Moore with this Court on January 27, 2014. Counsel filed the initial reply brief in the case of The State v. James Harris with the Court of Appeals on January 23, 2014. Counsel filed the initial reply brief in the case of The State v. Elizabeth M. Dinkins with the Court of Appeals on January 23, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Kemon P., a Minor Under the Age of Seventeen with this Court on January 22, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Darrell Birch with the Court of Appeals on January 21, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derrick Tyrone Blake v. State of South Carolina with this Court on January 17, 2014. Counsel filed a petition for writ of certiorari in the case of The State v. Anthony T. Williamson with the United States Supreme Court on January 16, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jimmy Charles Kendall, III v. State of South Carolina with this Court on January 15, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roger Dale Burke v. The State with this Court on January 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Richard J. Coleman v. The State with this Court on January 9, 2014. Counsel had an oral argument in the case of The State v. Christopher Lee Johnson in the Court of Appeals on January 7, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Anthony Allen v. State

of South Carolina with this Court on January 2, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Yolanda D. Thompson v. State of South Carolina with this Court on December 27, 2013. 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.

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,



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Carmen V. Ganjehsani  
Appellate Defender

Attorney for Petitioner

February 18<sup>th</sup>, 2014

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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 John Walt Whitmire, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18<sup>th</sup> day of February, 2014.

  
Carmen V. Ganjehsani  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18<sup>th</sup> day  
of February, 2014.

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