

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Calhoun County

Edgar W. Dickson, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

FEB 18 2014

S.C. Supreme Court

MICHAEL T. MCKNIGHT,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-001789

\_\_\_\_\_  
PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND ACCOMPANYING APPENDIX  
\_\_\_\_\_

The undersigned counsel respectfully requests a thirty-day extension in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed on **February 13, 2014, due to the inclement weather on February 13, and 14, 2014, I am filing this extension request today.**

2. On Monday, February 03, 2014, counsel had an oral argument in the South Carolina Court of Appeals in the case of State v. Cesar Portillo. On Monday, January 27, 2014 counsel filed the Anders brief of appellant and record on appeal in the case of State v. Sincere J. Owens. On Wednesday, January 15, 2014, counsel filed the Anders brief of appellant and record on appeal in the case of State v. Charlie Belser. On Monday, January 13, 2014, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Duval M. Cooper v. State. On Friday, January 10, 2014, counsel filed the initial brief of appellant and designation of matter in the case of State v. William Edward Price. On Friday, December 27, 2013, counsel filed the petition for writ of certiorari and accompanying appendix In the Interest of Justin B., a minor under the age of seventeen in the United States Supreme Court. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Clarence Kendall Cook v. State on Thursday, December 19, 2013. Also on Thursday, December 19, 2013, counsel filed the initial brief of appellant and designation of matter in the case of State v. Gabriel Jon Rios. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jonathan James v. The State of South Carolina on December 9, 2013. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio Moultrie v. State on December 9, 2013.

3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Kathrine H. Hudgins  
Appellate Defender

February 18, 2014

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Calhoun County

Edgar W. Dickson, Circuit Court Judge  
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MICHAEL T. MCKNIGHT,

PETITIONER,

V.

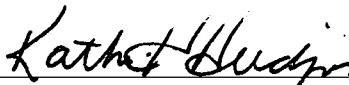
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-001789  
\_\_\_\_\_

CERTIFICATE OF SERVICE  
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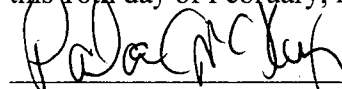
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Megan Herrigan, Esquire; at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201 this 18th day of February, 2014.



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Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 18th day of February, 2014.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 24, 2022.