

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_

Certiorari to Greenville County

D. Garrison Hill, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

MAR 11 2014

**S.C. Supreme Court**

FRED DOUGLAS DOWNER ,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO.2013-001851  
\_\_\_\_\_

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

The undersigned counsel would respectfully request a **final thirty-day extension, until April 10, 2014**, in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by two prior orders of this Court.
2. Counsel filed the initial brief of appellant in the case of State v. Janet Margaret Watkins in the Court of Appeals on March 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis Neal Biggerstaff v.

State in this Court on March 5, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jonathan Sinclair Porterfield v. State in this Court on February 19, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Octavius Livingston v. State in this Court on February 18, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Calvin Sharpe v. State in this Court on February 5, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Kerwin Parker in this Court on January 22, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William Sheroid Camp v. State in this Court on January 22, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Nicholas Antwan Stevenson v. State in this Court on January 16, 2014.

3. This request is made in good faith, and not for purposes of delay. Counsel is striving to limit the number of extensions requested. Counsel is attempting to complete the cases with the most number of extensions first.

4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until April 10, 2014**, in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

Susan B. Hackett for  
Wanda H. Carter  
Deputy Chief Appellate Defender

R M C  
Robert M. Dudek  
Chief Appellate Defender

March 11, 2014

I DO NOT OPPOSE:

Karen Ratigan  
Karen Ratigan