

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Richland County  
Edgar J. Dickson, Circuit Court Judge  
\_\_\_\_\_

ORIGINAL

RECEIVED

MAR 20 2014

S.C. Supreme Court

MICHAEL 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 **final thirty day extension, until April 21, 2014** 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 today.

2. Counsel filed the initial brief of appellant in the case of State v. Donald Peters on Wednesday, March 18, 2014 in the Court of Appeals. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. James West on March 12, 2014 in this Court. On Monday, February 24, 2014, counsel filed the petition for writ of certiorari and

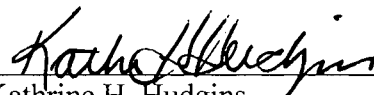
accompanying appendix in the case of State v. Antwan McMillan (in the COA). On Thursday, February 20, 2014, counsel had an oral argument in the case of Joseph Walker v. State in this Court. On Wednesday, February 19, 2014, counsel filed the initial brief of appellant and designation of matter in the case of State v. John Henry Smith. On Tuesday, February 18, 2014, counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Robert Mondriques Jones (in the COA). Also on Tuesday, February 18, 2014, counsel filed the reply brief of appellant in the case of State v. James Roscoe Scofield. On Monday, February 10, 2014, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ann Smith v. State. 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

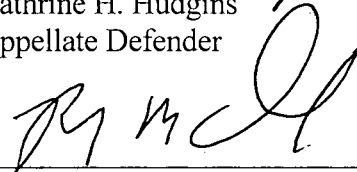
3. As indicated by her consent below, counsel for the state does not oppose this request.

4. 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 **final thirty day extension, until April 21, 2014**, in which to file the petition for writ of certiorari and accompanying appendix. 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.

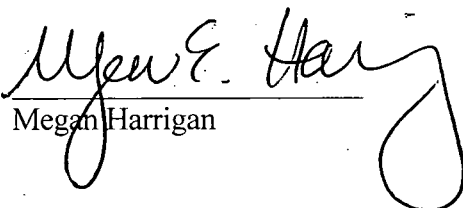
Respectfully submitted,

  
\_\_\_\_\_  
Kathrine H. Hudgins  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellant Defender

March 20, 2014

I do not oppose:

  
\_\_\_\_\_  
Megan Harrigan