

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Marlboro County
R. Ferrell Cothran, Jr., Circuit Court Judge

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APR - 4 2014

S.C. Supreme Court

MARCUS TOWNSEND,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002270

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

Counsel for Marcus Townsend 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 Marcus Townsend 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 will be filing today the initial brief of appellant and designation of matter in the case of The State v. Michael Ramey with the Court of Appeals. Counsel filed the petition for writ of certiorari in the case of Billy S. Tucker v. State of South Carolina with the Court of Appeals on March 28, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Lambert v. State of South Carolina with this Court on March 24, 2014. Counsel filed the brief of petitioner win the case of The State v. Rushan Counts with this Court on March 20, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darrell N. Mitchell v. State of South Carolina with this Court on March 20, 2014. Counsel had an oral argument in the case of The State v. Eric Hewins in this Court on March 18, 2014. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Karl Ryan Lane with this Court on March 13, 2014. Counsel filed the petition for writ of certiorari pursuant to Austin v. State in the case of Travis McKie v. State of South Carolina with this Court on March 7, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis McKie v. State of South Carolina with this Court on March 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dan Temple with the Court of Appeals on March 5, 2014. Counsel filed the petition for writ of certiorari in the case of Steven Michael LeCroy v. State of South Carolina with this Court on February 27, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Hubert Brown with the Court of Appeals on February 26, 2014. 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 thisd 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 the Supreme 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.

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,



Carmen V. Ganjehsani
Appellate Defender

Attorney for Petitioner

April 4th, 2014

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CERTIFICATE OF SERVICE

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 Joshua L. Thomas, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 4th day of April, 2014.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 4th day
of April, 2014.

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