

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

Honorable Michael Nettles, Circuit Court Judge

Case No. 08-CP-43-00905
Appellate Case No. 2013-001968

Bobby Wayne Stone, Petitioner,

v.

State of South Carolina, Respondent.

RECEIVED

APR 18 2014

S.C. SUPREME COURT

PETITIONER'S MOTION FOR EXTENSION
OF TIME TO FILE APPENDIX
AND PETITION FOR WRIT OF CERTIORARI

Petitioner, Bobby Wayne Stone, through undersigned counsel, for the reason stated below, respectfully requests that this Court grant an extension of time for 30 days to file the Petition for Writ of Certiorari and the Appendix presently due for filing on April 16, 2014. The reasons for this motion are as follows:

1. Undersigned counsel has begun work on the Petition and has compiled most of the necessary materials for the Appendix. However, copies of some items for the Appendix have been requested from the Sumter County Court Clerk's office, and they have not yet been provided.

2. Moreover, in the past thirty days, undersigned counsel has been working on investigation and case preparations for *Bell v. South Carolina*, *Stanko v. South Carolina*, *Bennett v.*

Stirling, and *Alkebulanyahh v. Byars* – all capital cases. Further, yesterday counsel filed an Appendix and Petition for Writ of Certiorari in a non-capital criminal matter – *Spriggs v. South Carolina*.

3. Finally, Mr. Stone’s case concerns complex factual and legal issues that require thorough record review, research and analysis. Undersigned counsel reasonably believes that an extension is needed to thoroughly and accurately brief the issues in this case.

THEREFORE, for the reasons stated above, petitioner respectfully submits that an extension of time is warranted for good cause and requests thirty days, thus making the Appendix and Petition for Writ of Certiorari due on or before May 16, 2014.

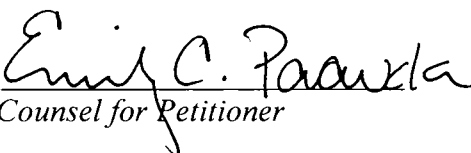
Respectfully submitted,

JOHN H. BLUME

Cornell Law School
158 Myron Taylor Hall
Ithaca, NY 14853
john@blumelaw.com
(607) 255-1030

EMILY C. PAAVOLA

Death Penalty Resource & Defense Center
900 Elmwood Avenue, Suite 101
Columbia, SC 29201
emily@deathpenaltyresource.org
(803) 765-1044

By: 
Counsel for Petitioner

April 15, 2014

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

Honorable Michael Nettles, Circuit Court Judge

Case No. 08-CP-43-00905
Appellate Case No. 2013-001968

Bobby Wayne Stone, Petitioner,

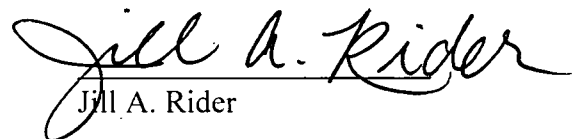
v.

State of South Carolina, Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Petitioner's Motion for Extension of Time to File Appendix and Petition for Writ of Certiorari was served by first class United States mail, postage prepaid, this 15th day of April, 2014, upon the following:

Alphonso Simon
Assistant Attorney General
P.O. Box 11549
Columbia, SC 29211


Jill A. Rider