

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Charleston County
Roger M. Young, Circuit Court Judge

RECEIVED

APR 21 2014

JOSE LUIS HERNANDEZ,

SC Supreme Court
PETITIONER

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-002061

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

The undersigned counsel respectfully requests a **final thirty day extension, until May 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 brief of appellant and designation of matter in the case of The State v. Vernon Jacob Livingston, Jr. with the Court of Appeals on April 16, 2014. Counsel had an oral argument in the case of The State v. Randy Crosby in the Court of Appeals on April 8, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donovan Murray v. State of South Carolina with this Court on April 7, 2014. Counsel filed the

initial brief of appellant and designation of matter in the case of The State v. Michael Ramey with the Court of Appeals on April 4, 2014. 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 this 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.

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

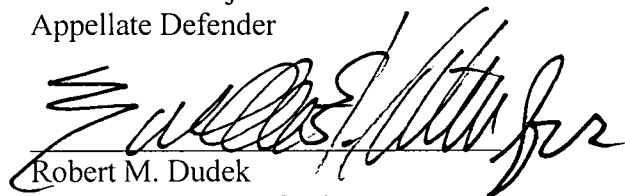
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until May 21, 2014**. 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,



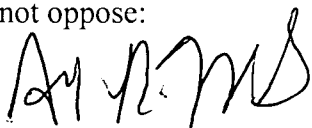
Carmen V. Ganjehsani
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

April 21st, 2014

I do not oppose:

A handwritten signature in black ink, appearing to read "Ashleigh R. Wilson". The signature is written in a cursive, somewhat stylized font. The first letter "A" is large and prominent, followed by "shleigh", then "R.", and finally "Wilson".

Ashleigh R. Wilson, Esquire