

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

**RECEIVED**

\_\_\_\_\_  
Certiorari to Charleston County  
Deadra L. Jefferson, Circuit Court Judge  
\_\_\_\_\_

MAY - 1 2014

**S.C. Supreme Court**

NATHANIEL McGEE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002540

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

Counsel for Nathaniel McGee 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 Nathaniel McGee 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 his caseload, counsel hopes that no further extension requests will be required.

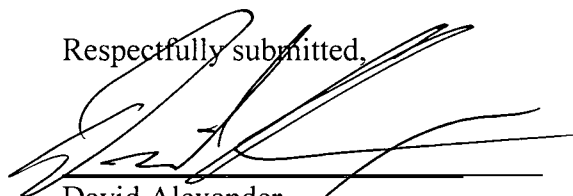
3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Erick Arroyo with the Court of Appeals on April 16, 2014. Counsel filed Reply Brief of Petitioner in the case of State v. Jomar Robinson with this Court on April 11, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Allen Johnson with the Court of Appeals on April 9, 2014. Counsel had oral argument in the case of State v. Steven Kranendonk with the Court of Appeals on April 8, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of In The Interest of Tyairy G., Minor with this Court on April 1, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix and the Austin v. State petition for writ of certiorari in the case of Donnie M. Malpass v. State with this Court on March 27, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Daniel McNeil v. State with this Court on March 25, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Lamar Sequan Brown with the Court of Appeals on March 24, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Tamar Bryant in the Court of Appeals on March 19, 2014. Counsel filed the reply brief of appellant in the case of State v. Brenda Bratschi in the Court of Appeals on March 14, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William L. Childers v. State in this Court on March 12, 2014. Counsel had an oral argument in the case of State v. Jason A. Johnson in the Court of Appeals on March 6, 2014. Counsel had an oral argument in the case of State v. Curtis J. Simms with co-counsel Robert M. Dudek in this Court on March 5, 2014. Counsel filed the petition for writ of certiorari and accompanying

appendix in the case of James Gunnells v. State in this Court on March 5, 2014. Counsel filed the brief of appellant in the case of State v. Curtis Fields in the Court of Appeals on February 26, 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,



David Alexander  
Appellate Defender

Attorney for Petitioner

May 1, 2014

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Charleston County  
Deadra L. Jefferson, Circuit Court Judge

---

NATHANIEL MCGEE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT


APPELLATE CASE NO. 2013-002540

---

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 Ashleigh R. Wilson, Esquire, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 1<sup>st</sup> day of May, 2014.



---

David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 1st day  
of May, 2014.

Ghonda Deneese Jayworth (L.S.)

Notary Public for South Carolina

My Commission Expires: October 17, 2021.