

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Marlboro County

R. Ferrell Cothran, Jr., Circuit Court Judge

RECEIVED
MAY - 5 2014
S.C. Supreme Court

MARCUS TOWNSEND,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-002270

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

The undersigned counsel respectfully requests a **final thirty day extension, until June 4, 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 in the case of Donald C. Brevard v. State of South Carolina with the Court of Appeals on April 25, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shawn Williams v. State of South Carolina with this Court on April 21, 2014. 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.

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

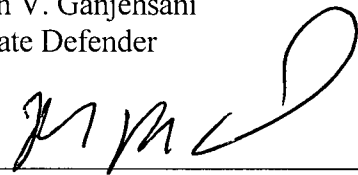
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until June 4, 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,



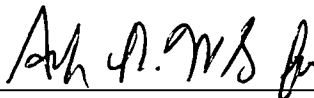
Carmen V. Ganjehsani
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

May 5th, 2014

I do not oppose:



Joshua L. Thomas, Esquire