

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Greenville County  
Edward W. Miller, Circuit Court Judge

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**RECEIVED**

JUN 19 2014

**S.C. Supreme Court**

KENNETH W. WORKMAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002789

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

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Counsel for Kenneth W. Workman respectfully requests an extension of thirty (30) days, **until July 21, 2014**, 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 Kenneth W. Workman 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.

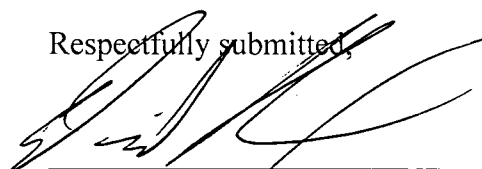
3. Counsel filed the petition for writ of certiorari and accompanying appendix and petition for writ of certiorari and accompanying appendix, pursuant to *Austin v. State* in the case of Clarence Crittendon v. State with this Court on June 18, 2014. Counsel filed the initial brief and designation of matter in the case of State v. Paul Chandler, with the Court of Appeals on June 10, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Horace Lee Glover, Jr., with the Court of Appeals on June 6, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Willie M. Williams with the Court of Appeals on June 5, 2014. Counsel had an oral argument in the case of State v. Michael D. Williams with the Court of Appeals on June 3, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jerry Scantling with the Court of Appeals on May 21, 2014. Counsel filed reply to return to petition for writ of certiorari in the case of Jose Angel Herrera v. State with this Court on May 15, 2014. Counsel filed an initial reply brief of appellant in the case of State v. Akeem O. Smith with the Court of Appeals on May 15, 2014. Counsel had an oral argument in the case of State v. Henry Gray with the Court of Appeals on May 13, 2014. Counsel filed Petition for Rehearing in the case of State v. Julian Deandre Battle in the Court of Appeals on May 8, 2014. Counsel had an oral argument in the case of State v. William Coaxum with this Court on May 8, 2014. Counsel had an oral argument in the case of State v. Edward Dunn with the Court of Appeals on May 7, 2014. Counsel had an oral argument in the case of State v. Steven Frost with the Court of Appeals on May 7, 2014. Counsel filed reply to the return to the petition for writ of certiorari in the case of Marion Bowman v. State with this Court on May 5, 2014. Counsel filed the initial brief of appellant and

designation of matter in the case of State v. Zinah Damaris Jennings (transcripts and pleadings exceeded 1,800 pages) in the Court of Appeals on May 1, 2014. 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.

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, **until July 21, 2014**, 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,



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David Alexander  
Appellate Defender

Attorney for Petitioner

June 19, 2014

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CERTIFICATE OF SERVICE

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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 Karen Ratigan, Esquire, Senior Assistant Deputy Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 19<sup>th</sup> day of June, 2014.



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David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 19<sup>th</sup> day  
of June, 2014.

Rhonda Demese Zayworth (L.S.)  
Notary Public for South Carolina  
My Commission Expires: October 17, 2021.