

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County

William Jeffrey Young, Circuit Court Judge

RECEIVED

JUN 30 2014

RANDALL S. TYLER,

S.C. Supreme Court
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-000795

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

Counsel for Randall Tyler respectfully requests a **final thirty (30) day extension, until July 30, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Mr. Randall Tyler 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 her caseload, counsel hopes that no further extension requests will be required.

3. Counsel had an oral argument in the case of State v. Jomar Robinson with the Supreme Court on June 24, 2014. Counsel filed the petition for rehearing in the case of State v. Steven Krandonk with the Court of Appeals on June 19, 2014. 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 the Court of Appeals 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 the Supreme 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 the Supreme 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 the Supreme 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.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

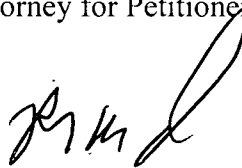
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until July 30, 2014**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander
Appellate Defender

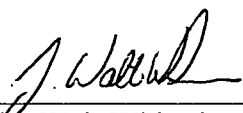
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 30th day of June, 2014.

I consent:



John Walt Whitmire, Esquire