

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County
William H. Seals Jr., Circuit Court Judge

RECEIVED

JUL 16 2014

S.C. Supreme Court

THOMAS E. VANHOOSE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002788

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

Counsel for Alexander Samuel 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 Alexander Samuel 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 filed the petition for rehearing in the case of The State v. Gregory Ivery with the Court of Appeals on Tuesday, July 15, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey Evans v. State with this Court, Monday, July 14, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Roderick Sellers with the Court of Appeals on Friday, July 11, 2014. Counsel filed the petition for rehearing in the case of The State v. Taurus Lamare Thompson with the Court of Appeals on July 3, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Steven Morgan in the Court of Appeals on June 30, 2014. Counsel filed the petition for rehearing in the case of The State v. James C. Tyner with the Court of Appeals on June 26, 2014. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Jimmy Charles Kendall, III v. State of South Carolina with this Court on June 18, 2104. Counsel filed the petition for rehearing in the case of The State v. Forrest Kelly Samples with the Court of Appeals on June 17, 2104. Counsel had an oral argument in the case of The State v. Donald M. Anderson in the Court of Appeals on June 17, 2014. Counsel filed the brief of petitioner in the case of George Wigington v. State of South Carolina with the Court of Appeals on June 11, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gregory Mark Crolley v. State of South Carolina with this Court on June 5, 2014. Counsel had an oral argument in the case of The State v. Gregory Ivery in the Court of Appeals on June 5, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Emmons with the Court of Appeals on June 4, 2014. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Derrick

Tyrone Blake v. State of South Carolina with this Court on June 2, 2014. Counsel filed the petition for rehearing in the case of The State v. Christopher Lee Johnson with the Court of Appeals on May 28, 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,



Carmen V. Ganjehsani
Appellate Defender

Attorney for Petitioner

July 16, 2014

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IN THE SUPREME COURT

Certiorari to Florence County
William H. Seals Jr., Circuit Court Judge

THOMAS VANHOOSE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002630

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 Daniel Gourley, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 16th day of July, 2014.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 16th day
of July, 2014.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 24, 2021.