

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Maite Murphy, Circuit Court Judge

RECEIVED

JUL 28 2014

S.C. Supreme Court

THE STATE,

APPELLANT,

V.

SHANNON SCOTT,

RESPONDENT

APPELLATE CASE NO. 2013-002124

PETITION FOR EXTENSION TO FILE
THE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER

The undersigned counsel respectfully requests a **final extension until August 21, 2014**, in which to file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of respondent and designation of matter are due to be filed with the Court today.
2. Counsel for Shannon Scott respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. **Due to an administrative oversight this case was not calendared as a three extension requested case. Undersigned counsel apologizes for this oversight and the necessity of this final extension request.**

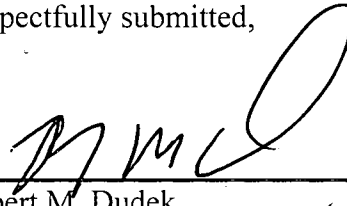
3. Counsel filed the return to the petition for writ of certiorari yesterday in James Waiters v. State. Counsel also filed a petition for writ of certiorari and accompanying appendix in the case of In The Matter of the Care and Treatment of Patrick Guess with this Court on July 23, 2014. Additionally, counsel filed the petition for rehearing with co-counsels Charles Grose, Jr. and Shane E. Goranson in the case of State v. Anthony Nation with this Court on July 17, 2014. Counsel also filed the petition for writ of certiorari and accompanying appendix in the case of Daryl L. Gray v. State with this Court on July 14, 2014. Counsel also filed the initial brief of appellant and designation of matter in the case of State v. Harold Cartwright with the Court of Appeals on July 11, 2014. Counsel also filed a motion to vacate convictions, remand for a new trial and to dismiss the appeal in the case of State v. Christina Reece, with the Court of Appeals on July 3, 2014 Counsel also had an oral argument in the case of State v. Richard Niles Jr. in this Court on June 25, 2014. Counsel also filed the brief of petitioner in the case of State v. Christopher Heller in this Court on June 23, 2014. Counsel also filed the initial brief of appellant and designation of matter in the case of State v. Joseph Walker with the Court of Appeals on June 13, 2014. Counsel also had an oral argument in the case of State v. Darian Robinson in this Court on June 12, 2014. Counsel also filed the petition for rehearing in the case of State v. Bayan Aleskey, a death penalty case with this Court, on June 6, 2014. Counsel also filed the initial brief of appellant and designation of matter in the case of State v. Anthony C. Johnson with the Court of Appeals on June 4, 2014. Counsel also filed the initial brief of appellant and designation of matter in the case of State v. McIver Feagin with the Court of Appeals on May 23, 2014.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel is working first on cases that have been extended three times in an effort to make his caseload more manageable and reduce the number of extensions in the future.

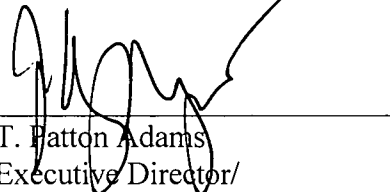
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a final extension extension, **until August 21, 2014**, in which to file the initial brief of respondent and designation of matter in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



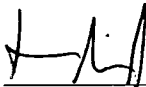
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director/
J. Hugh Ryan, III
General Counsel

This 28th day of July, 2014.

I consent:



Alphonso Simon, Jr.