

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

KENNETH W. WORKMAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

RECEIVED

APPELLATE CASE NO. 2013-002789

JUL 30 2014

S.C. SUPREME COURT

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

Counsel for Kenneth W. Workman respectfully requests an extension of thirty (30) days, **until September 15, 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 July 14, 2014. This is counsel's first request for an extension. In support of this request, counsel shows:

1. Counsel was appointed by Order of the Supreme Court dated July 14, 2014, due to a conflict of interest in the Office of Appellate Defense.
2. Counsel has trials scheduled on the Thirteenth Circuit General Sessions docket on August 5th for a Habitual Offender case and August 12, 2014, for three counts of armed robbery.

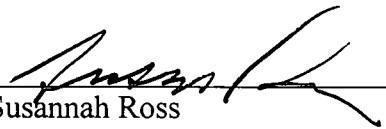
3. Without an extension, counsel could not devote the time necessary to effectively represent Mr. Workman in his Appeal.

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 September 15, 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,



Susannah Ross
Attorney for the Applicant
2435 E. North Street, #222
Greenville, SC 29615
(864) 242-0029

Greenville, South Carolina
July 28, 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

KENNETH W. WORKMAN,

PETITIONER,

V.

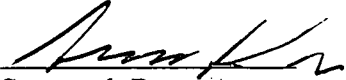
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002789

CERTIFICATE OF SERVICE

I certify that I have served 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 on Karen Ratigan, Esquire, Senior Assistant Deputy Attorney General, by depositing said copy in the United States Mail, postage prepaid, on July 28, 2014, addressed to Attorney General of South Carolina, Attn: Karen Ratigan, P.O. Box 11549, Columbia, SC 29211


Susannah Ross, Attorney at Law
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(864) 242-0029
Attorney for Appellant

July 28, 2014

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