

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Laurens County
Clifton Newman, Circuit Court Judge

RECEIVED

AUG 14 2014

S.C. Supreme Court

STATE OF SOUTH CAROLINA,

PETITIONER,

V.

IAN RICE,

RESPONDENT

APPELLATE CASE NO. 2013-001781

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

Counsel for Ian Rice respectfully requests an extension of thirty (30) days in which to file the return to petition for writ of certiorari 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 return to petition for writ of certiorari is due to be served and filed with the Court today.
2. Counsel for Ian Rice 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 initial brief of appellant and designation of matter in the case of State v. Kenneth Bell with the Court of Appeals on August 11, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Anthony Wilson v. State in this Court on Thursday, August 7, 2014. Counsel filed the initial reply brief in the case of State v. Dan Temple in the Court of Appeals on Thursday, August 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jovan Mitchell in the Court of Appeals on August 1, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joshua Paris v. State in this Court on Monday, July 28, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Robert Byrd v. State in this Court on July 23, 2014. Counsel filed the brief of petitioner in the case of State v. Norman Hayes in the Court of Appeals on July 18, 2014. Counsel filed the petition for rehearing in the case of The State v. Gregory Ivery with the Court of Appeals on 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 on 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 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.

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,

A handwritten signature in black ink, consisting of stylized cursive letters, positioned above a horizontal line.

Carmen V. Ganjehsani
Appellate Defender

Attorney for Respondent

August 14, 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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STATE OF SOUTH CAROLINA,

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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 j. Rutledge Johnson, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 14th day of August, 2014.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 14th day
of August, 2014.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 24, 2021.