

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Spartanburg County  
J. Derham Cole, Circuit Court Judge

---

**RECEIVED**

AUG 18 2014

**S.C. Supreme Court**

CULLEN CAMPBELL,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000635

---

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

---

Counsel for Cullen Campbell 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:

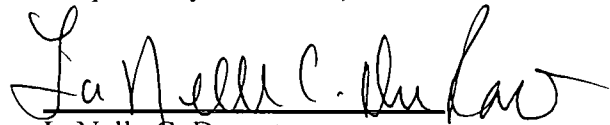
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Cullen Campbell respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously 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 writ of certiorari and accompanying appendix in the case of Roger Eugene Shephard v. State of South Carolina with this Court on August 12, 2014. Counsel filed the return to the petition for writ of certiorari in the case of The State v. Travas D. Jones with this Court on August 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Thomas Clinton Jordan Lockridge with the Court of Appeals on August 1, 2014. Counsel filed the petition for rehearing in the case of The State v. Theodore David Wills, Jr. with this Court on July 31, 2014. Counsel filed the brief of respondent in the case of The State v. Christopher Broadnax with this Court on July 23, 2014. Counsel filed the petition for rehearing in the case of The State v. Jake Antonio Wilson with this Court on July 21, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Curtis Randall Sweatt, Jr. v. State of South Carolina with this Court on July 17, 2014. Counsel filed the brief of petitioner in the case of Vante R. Birch v. State of South Carolina with the Court of Appeals on July 16, 2014. Counsel filed the brief of petitioner in the case of The State v. Demetrius Goodwin with this Court on July 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Michael Hollis v. State of South Carolina with this Court on July 8, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kenneth Gerald Butler with the Court of Appeals on June 25, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Shawn Reaves with this Court on June 23, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William Germaine Henry v. State of South Carolina with this Court on June 23, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joseph Dominick Urato v. State of South Carolina with this Court on June 19, 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, appearing to read "LaNelle C. Durant", written over a horizontal line.

LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner

August 18<sup>th</sup>, 2014

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Spartanburg County  
J. Derham Cole, Circuit Court Judge

---

CULLEN CAMPBELL,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

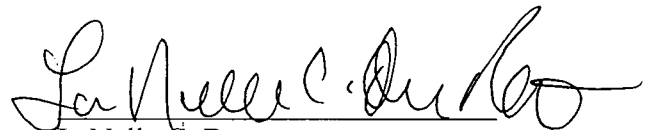
RESPONDENT

---

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 Suzanne H. White, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18<sup>th</sup> day of August, 2014.



LaNelle C. Durant  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18<sup>th</sup> day  
of August, 2014.

Mark Jendral (L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 3, 2023.