 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Cherokee County

J. Derham Cole, Circuit Court Judge

RECEIVED

AUG 18 2014

S.C. Supreme Court

DONALD SCOTT JONES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000670

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

Counsel respectfully requests a thirty day extension in which to file the 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 petition for writ of certiorari and appendix is due to be served and filed with the Court today.
2. Counsel 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.

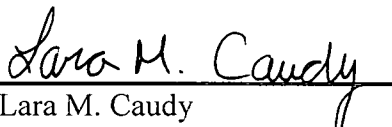
3. On August 7, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Randolph Frazier v. State with this Court. On August 4, 2014, counsel filed a petition for writ of certiorari, accompanying appendix and supplemental appendix in Kevin Walton v. State with this Court. On July 30, 2014, counsel filed an initial brief of appellate and designation of matter in State v. Ray C. Warren with the Court of Appeals. On July 28, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in James Freddie Miller v. State with this Court. On July 25, 2014, counsel filed an initial brief of appellant and designation of matter in State v. Timothy R. Wirtz in the Court of Appeals. On July 18, 2014, counsel filed an initial brief of appellant and designation of matter in State v. Bruce Dewayne Hall in the Court of Appeals. On July 10, 2014, counsel filed an initial brief of appellant and designation of matter in State v. Jeremy Smith with the Court of Appeals. On July 9, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Stufon Nixon v. State with this Court. On July 7, 2014, counsel filed a brief of appellant and record on appeal in State v. David Dixon with the Court of Appeals. On July 3, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Kaseem Stephens v. State with this Court. On June 27, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Yesenia Ramirez v. State with this Court. On June 12, 2014, counsel filed a petition for writ of certiorari, accompanying appendix, and brief of appellant pursuant to White v. State in Hashin Allie ONeil v. State with this Court. On June 6, 2014, counsel filed a petition for rehearing in Bayan Aleksey v. State with this Court. On June 2, 2014, counsel filed an initial brief of appellant and designation of matter in State v. Brad Alan Day with the Court of Appeals.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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 in this case based upon the above exigent circumstances.

Respectfully submitted,


Lara M. Caudy
Appellate Defender

Attorney for Petitioner

August 18, 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

DONALD SCOTT JONES,

PETITIONER,

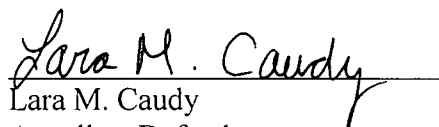
V.

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, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18th day of August, 2014.


Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18th day
of August, 2014

 (L.S.)

Notary Public for South Carolina

My Commission Expires: July 24, 2022