

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Florence County

William H. Seals Jr., Circuit Court Judge

RECEIVED

AUG 18 2014

S.C. Supreme Court

THOMAS E. VANHOOSE,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2013-002788

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final thirty day extension, until September 17, 2014**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. 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. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Jimmy Charles Kendall, III v. State of South Carolina with this Court on June 18, 2104. Counsel filed the petition for rehearing in the case of The State v. Forrest Kelly Samples with the Court of Appeals on June 17, 2104.

3. As indicated by his consent below, counsel for the state does not oppose this request.

4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will

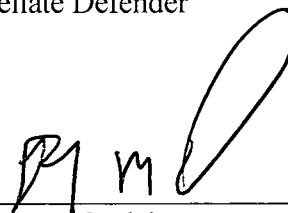
hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until September 17, 2014**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



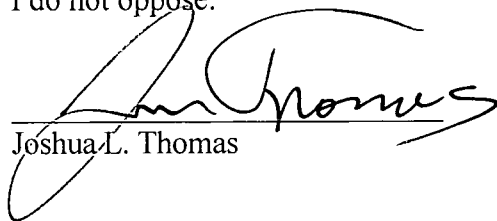
Carmen V. Ganjehsani
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

August 18, 2014

I do not oppose:



Joshua L. Thomas