

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
G. Edawad Welmaker, Circuit Court Judge

RECEIVED

AUG 22 2014

S.C. Supreme Court

ZACHARY FOWLER,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000489

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

Counsel for Zachary Fowler 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 Zachary Fowler 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel is currently working on Michael D. Hall v. State of South Carolina, a new case pending in the Supreme Court's original jurisdiction with impending deadlines that cannot be extended. Counsel filed the initial brief of appellant and designation of matter in the case of State v. William Donald Bolt with the Court of Appeals on August 20, 2014. Counsel filed the brief of appellant and designation of matter in the case of State v. Talmadge Rowell with the Court of Appeals on August 8, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Edward Haynes with the Court of Appeals on July 29, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Randall S. Tyler v. State of South Carolina with this Court on July 28, 2014. Counsel filed the brief of appellant and designation of matter in the case of State v. Benjamin William Rhodes with the Court of Appeals on July 17, 2014. Counsel filed the petition for rehearing in the case of State v. Jason Alan Johnson with the Court of Appeals on July 14, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon S. McDevitt v. State of South Carolina with this Court on July 14, 2014. Counsel filed the brief of petitioner in the case of Charles Ray Dean v. State of South Carolina with the Court of Appeals on July 11, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix to the Court of Appeals in the case of State v. Eric Wright with this Court on July 11, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew Antwan Jackson with the Court of Appeals on July 11, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Nathaniel McGee v. State of South Carolina with this Court on July 2, 2014. Counsel had an oral argument in the case of State

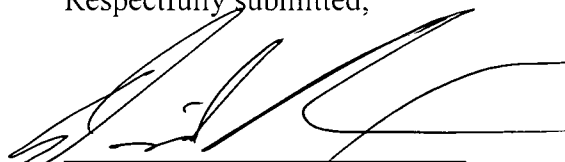
v. Jomar Robinson with this Court on June 24, 2014. Counsel filed the petition for rehearing in the case of State v. Steven Krandonk with the Court of Appeals on June 19, 2014.

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 'David Alexander', written over a horizontal line.

David Alexander
Appellate Defender

Attorney for Petitioner

August 22nd, 2014

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IN THE SUPREME COURT

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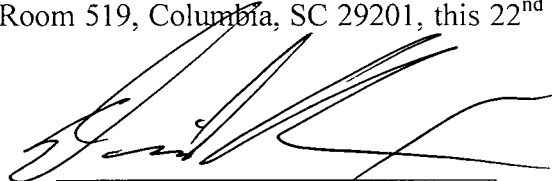
V.

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 Karen Ratigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 22nd day of August, 2014.



David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 22nd day
of August, 2014.

Marie Linder (L.S.)

Notary Public for South Carolina

My Commission Expires: July 3, 2023.