

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Horry County

Edward B. Cottingham, Circuit Court Judge

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SEP - 8 2014

S.C. Supreme Court

THE STATE,

RESPONDENT,

V.

ALEX ROBINSON,

PETITIONER

APPELLATE CASE NO. 2014-001545

PETITION FOR EXTENSION TO FILE
RETURN TO PETITION FOR WRIT OF CERTIORARI

Counsel for Alex Robinson respectfully requests an extension of twenty (20) 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 July 16, 2014. This is first request for an extension pursuant to this Order. 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 Richard Alex Robinson respectfully submits that good cause exists which warrants the granting of this extension of time.
3. Counsel requests this extension because she was not involved with the case at the Court of Appeals below and will need to familiarize herself with a Record on Appeal exceeding 500 pages to respond to the State's Petition for Writ of Certiorari which exceeded the 25-page

limit. Counsel has also been preparing for oral arguments to be held at the Court of Appeals on September 8 and 9, 2014. Counsel is also preparing to file five petitions for writ of certiorari to this Court from the Court of Appeals within the next twenty days. Counsel also has five other briefs or petitions due the remainder of this month in direct and post-conviction relief cases

4. Counsel filed the filed the initial brief of appellant and designation of matter in the case of State v. Martin Floyd with the Court of Appeals on Friday, September 5, 2014. Counsel filed the brief of petitioner in the case of State v. Richard Beekman with this Court on September 4, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shannon McGee v. State with this Court on September 4, 2014. Counsel filed the petition for rehearing the in the case of State v. Randy Crosby with the Court of Appeals on September 4, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Robert Orlando Hill v. State with this Court on August 28, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Dennis Penny with the Court of Appeals, yesterday, August 27, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dytavis Hinton v. State in this Court on August 21, 2014 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 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

5. Counsel makes this request in good faith and not for purpose of delay.
6. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a twenty day extension, in which to file the return to petition for writ of certiorari in this case based upon the above stated reasons. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Carmen V. Ganjehsani
Appellate Defender

Attorney for Petitioner

September 8, 2014

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THE STATE,

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file the return to petition for writ of certiorari in the above referenced case has been served upon Mark R. Farthing, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, and upon the South Carolina Court of Appeals, this 8th day of September, 2014.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 8th day of September, 2014.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: October 24, 2021 .