

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Beaufort County  
Deadra L. Jefferson, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

SEP 15 2014

S.C. Supreme Court

RAMON ATIENZO-PEREZ,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2014-000307  
\_\_\_\_\_

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

Counsel for Ramon Atienzo-Perez respectfully requests a **final thirty (30) day extension, until October 15, 2014**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.

2. Counsel for Mr. Ramon Atienzo-Perez 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 is filing today the petition for writ of certiorari and accompanying appendix in the case of Kent R. Clayton v. State of South Carolina with this Court. Counsel had an oral argument in the case of The State v. Keeon Butler with the Court of Appeals on September 11, 2014. Counsel had an oral argument in the case of The State v. Donna Lynn Phillips in the Court of Appeals on September 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jason Turmon v. State of South Carolina with this Court on September 10, 2014. Counsel filed the brief of petitioner in the case of The State v. David Jakes with this Court on September 3, 2014. Counsel filed the petition for rehearing in the case of The State v. Roderick Pope with the Court of Appeals on September 2, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Israel Colecio v. State of South Carolina with this Court on August 28, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher Robinson v. State of South Carolina with this Court on August 26, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lewis E. Pipher v. State of South Carolina with this Court on August 22, 2014. Counsel filed the brief of petitioner in the case of Tijuan Peake v. State of South Carolina with this Court on August 19, 2014. 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

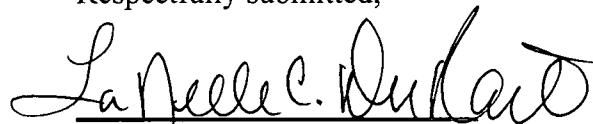
Broadnax with this Court on July 23, 2014. Counsel filed the petition for rehearing in the case of The State v. Jake Antonio Wilson with this Court on July 21, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Curtis Randall Sweatt, Jr. v. State of South Carolina with this Court on July 17, 2014.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

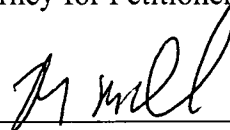
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until October 15, 2014**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 15<sup>th</sup> day of September, 2014.

I consent:



Ashleigh R. Wilson, Esquire