

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Horry County
George C. James, Jr., Circuit Court Judge

RECEIVED

OCT 16 2014

S.C. Supreme Court

THOMAS EARNEST WEBB,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-0001381

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

Counsel for Thomas Webb 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 Thomas Webb 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.

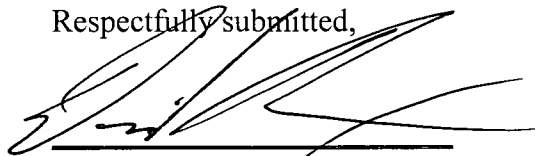
3. **Counsel is also working in the case of State v. Ricky Lee Blackwell, a direct appeal in a capital case, and the transcript is 4.751 pages long.** Counsel filed the petition for rehearing in the case of State v. Anthony Jackson with the Court of Appeals on October 14, 2014. Counsel filed the initial reply brief in the case of State v. Erick Arroyo with the Court of Appeals on October 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sterling Devonte Brown v. State of South Carolina with this Court on October 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Markelle Jamar Reid v. State of South Carolina with this Court on October 8, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Steven Kranendonk with this Court on October 6, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Jason Alan Johnson with this Court on October 3, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Greg K. Isaac with the Court of Appeals in September 26, 2014. Counsel attended and participated in the 2014 Annual Public Defender on September 22, 23, and 24, 2014. Counsel filed the brief of appellant in the case of State v. Jabriel L. Singleton with the Court of Appeals on September 19, 2014. Counsel had an oral argument in the case of State v. Antonio Glover in the Court of Appeals on September 11, 2014. Counsel had an oral argument in the case of State v. Anthony Jackson in the Court of Appeals on September 10, 2014. Counsel had an oral argument in the case of State v. Christopher Paul Mahaffey in the Court of Appeals on September 9, 2014. Counsel filed the brief of petitioner in the case of State v. Darren G. Scott with this Court on September 4, 2014. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of State v. Julian De'Andre Battle with this Court on September 3, 2014. Counsel filed the return to the petition for writ of certiorari to

the Court of Appeals in the case of State v. Kevin Tyrone Bennett with this Court on August 28, 2014. Counsel filed the record on appeal in the case of Michael D. Hall v. State of South Carolina which was granted, and expedited in the original jurisdiction of the Supreme Court, with this Court on August 27, 2014, as co-counsel. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gerald Barrett with the Court of Appeals on August 27, 2014. Counsel filed the designation of matter in the case of Michael D. Hall v. State of South Carolina with this Court on August 22, 2014, as co-counsel. 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.

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,



David Alexander
Appellate Defender

Attorney for Petitioner

October 16th, 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Horry County
George C. James, Jr., Circuit Court Judge

THOMAS EARNEST WEBB,

PETITIONER,

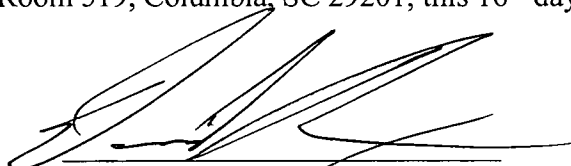
V.

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 Joshua L. Thomas, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 16th day of October, 2014.



David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 16th day
of October, 2014.

Marie Jernstedt (L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.