 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Colleton County

James R. Barber, III, Circuit Court Judge  
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**RECEIVED**

OCT 20 2014

**S.C. Supreme Court**

MICHAEL T. SANDERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000955

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

Counsel respectfully requests a thirty day extension in which to file the petition for writ of certiorari 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 is due to be served and filed with the Court today.
2. Counsel 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. On October 15, 2014, counsel filed a Memorandum in Support of a Motion for a New Trial in State v. Travoris Hurst with the Court of Appeals. On October 9, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Michael Daniels v. State with this Court. On October 7, 2014, counsel held an oral argument in State v. Damon T. Brown before the Court of Appeals. On October 3, 2014, counsel filed a brief of appellant and record on appeal in State v. Nicholas B. Glover with the Court of Appeals. On October 1, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in David Myers v. State with this Court. On September 22, 2014 through September 24, 2014, counsel attended the Public Defender's Conference. On September 19, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Michael Watts v. State with this Court. On September 18, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Quintin J. Holt v. State with this Court. On September 11, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Donald S. Jones v. State with this Court. On September 8, 2014, counsel held an oral argument in State v. Derell Green before the Court of Appeals. On September 5, 2014, counsel filed a brief of appellant and record on appeal in In the interest of Bradley M. with the Court of Appeals. On August 28, 2014, counsel participated in a reconstruction hearing scheduled before the Honorable L. Casey Manning in the case of State v. Michael Hockaday. On August 27, 2014, counsel filed an initial brief of appellate and designation of matter in State v. Greg J. Floyd with the Court of Appeals. On August 22, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Arkella Rena Brown v. State with this Court. On August 21, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Derrick Grant v. State

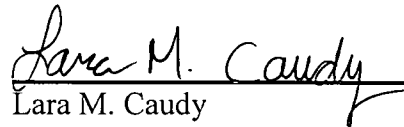
with this Court. On August 14, 2014, counsel participated in a reconstruction hearing scheduled before the Honorable J. C. Nicholson in the case of State v. Travoris Hurst.

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

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 in this case based upon the above exigent circumstances.

Respectfully submitted,



Lara M. Caudy  
Appellate Defender

Attorney for Petitioner

October 20, 2014

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Colleton County  
James R. Barber, III, Circuit Court Judge

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MICHAEL T. SANDERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

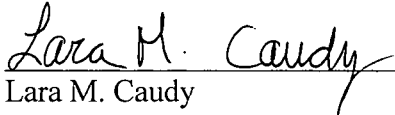
RESPONDENT

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CERTIFICATE OF SERVICE

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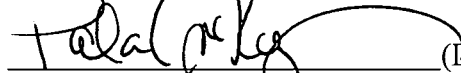
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Ashleigh R. Wilson, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 20<sup>th</sup> day of October, 2014.

  
Lara M. Caudy

Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 20th day  
of October, 2014

  
(L.S.)

Notary Public for South Carolina

My Commission Expires: July 24, 2022.