

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Union County

John C. Hayes III, Circuit Court Judge

RECEIVED

OCT 20 2014

S.C. Supreme Court

THE STATE,

RESPONDENT,

V.

RANDY CROSBY,

PETITIONER

APPELLATE CASE NO. 2011-205207

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

Counsel for Randy Crosby respectfully requests an extension of five (5) days in which to file petition for writ of certiorari and accompanying appendix 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 petition for writ of certiorari and accompanying appendix are due to be served and filed with the Court today.

2. Counsel for Richard Randy Crosby respectfully submits that good cause exists which warrants the granting of this extension of time.

3. Counsel filed the return to petition for writ of certiorari in the case of Ian Rice v. State with the Supreme Court on October 15, 2014. Counsel filed the petition for rehearing in the case of State v. Elizabeth Dinkins with the Court of Appeals on October 9, 2014. Counsel filed

the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Rodney Young v. State with the Supreme 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 Darnell Russell v. State with the Supreme Court on October 8, 2014. Counsel had an oral argument in the case of State v. Marcus Allison in the Court of Appeals on October 6, 2014. Counsel filed the initial brief and designation of matter in the case of State v. Toshonda Mickens with the Court of Appeals on October 2, 2014. Counsel filed the initial brief and designation of matter in the case of State v. Andre Decosta with the Court of Appeals on September 26, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Taurus Thompson v. State with the Supreme Court on September 18, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Donald Anderson v. State with the Supreme Court on September 18, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Gregory Ivery v. State with the Supreme Court on September 18, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Randall Sanders v. State with the Supreme Court on September 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alexander Samuel v. State with the Supreme Court on September 10, 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 five day extension, in which to file the petition for writ of certiorari and accompanying appendix 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

October 20, 2014

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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 20th day of October, 2014.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 20th day of October, 2014.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: October 24, 2021.