

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
G. Edward Welmaker, Circuit Court Judge

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OCT 22 2014

S.C. Supreme Court

FAVIAN HAYES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000837

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

Counsel for Favian Hayes 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 Favian Hayes 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 filed the return to petition for writ of certiorari in the case of Ian Rice v. State with this 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 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 Darnell Russell v. State with this 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 this 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 this 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 Greggory Ivery v. State with this 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 this 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 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,



Carmen V. Ganjehsani
Appellate Defender

Attorney for Petitioner

October 22, 2014

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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 Karen Ratigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 22nd day of October, 2014.



Carmen V. Ganjehsani
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 22nd day
of October, 2014.

 (L.S.)

Notary Public for South Carolina
My Commission Expires: October 24, 2021.