

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Robin B. Stilwell, Circuit Court Judge

MYKEL WATKINS,

RECEIVED

NOV - 5 2014

PETITIONER
S.C. Supreme Court

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000964

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a **final thirty-day extension, until December 5, 2014**, in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by two prior orders of this Court.
2. Counsel argued in the case of State v. Brian E. Lorick, Jr. in the Court of Appeals on November 4, 2014. Counsel argued in the case of State v. Ubaldo Garcia in the Court of Appeals on November 3, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio Calloway v. State in this

Court on October 20, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Oneil Robinson v. State in this Court on October 20, 2014. Counsel filed the petition for rehearing in the case of State v. Derrick A. McIlwain in the Court of Appeals on October 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leonard Roper v. State in this Court on October 8, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin Ware v. State in this Court on October 8, 2014. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Christopher Jermane Hicks in the Court of Appeals on September 26, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Bobby Mack Mathis v. State in this Court on September 19, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis T. Tracy v. State in this Court on September 19, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Mark R. Bolte v. State in this Court on September 19, 2014. Counsel filed the petition for writ of certiorari in the case of Michael C. Kennedy v. State in this Court on September 10, 2014.

3. This request is made in good faith, and not for purposes of delay. Counsel is striving to limit the number of extensions requested. Counsel is attempting to complete the cases with the most number of extensions first.

4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until December 5, 2014**, in which to file the petition for writ of certiorari

and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

Susan S. Hackett for
Wanda H. Carter
Deputy Chief Appellate Defender

RM
Robert M. Dudek
Chief Appellate Defender

November 5, 2014

I DO NOT OPPOSE:

SHW for
Suzanne H. White