

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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

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NOV - 6 2014

S.C. Supreme Court

PHILLIP FLEMING WATTS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002720

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

Counsel for Michael Smith respectfully requests an extension of thirty (30) days, **until December 8, 2014**, 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 Phillip Fleming Watts 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.

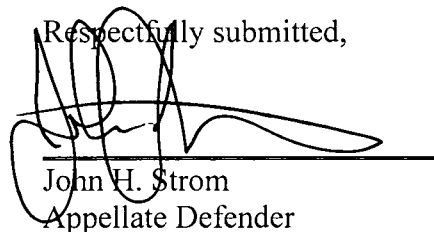
3. Appellate Defender John Strom began working with the Division of Appellate Defense on Thursday, September 25, 2014, at which time this case was re-assigned to him as counsel of record.

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, **until December 8, 2014**, 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,

A handwritten signature in black ink, appearing to read 'John H. Strom', is written over a solid horizontal line. The signature is stylized and somewhat cursive.

John H. Strom
Appellate Defender

Attorney for Petitioner

This 6th day of November, 2014.

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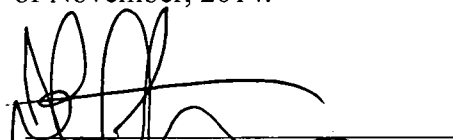
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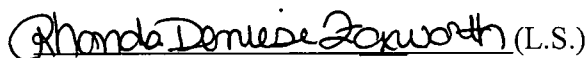
CERTIFICATE OF SERVICE

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 J. Rutledge Johnson, Esquire, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 6th day of November, 2014.


John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 6th day
of November, 2014.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: October 17, 2021.