 ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Richland County  
Alison Renee Lee, Circuit Court Judge

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NOV - 7 2014

S.C. Supreme Court

JERENE HAYWARD,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000633

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

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Counsel for Jerene Hayward 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 Jerene Hayward 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 had an oral argument in the case of State v. Mauricio Rivers in the Court of Appeals on November 5, 2014. Counsel filed the petition for rehearing in the case of the State v. James Harris with the Court of Appeals on October 30, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Randy Crosby v. State with this Court on October 27, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Hazell Stoudemire v. State with this Court on October 20, 2014. 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.

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 final 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,

A handwritten signature in black ink, consisting of two stylized, cursive 'C' characters followed by a small dash.

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Carmen V. Ganjehsani  
Appellate Defender

Attorney for Petitioner

November 7, 2014

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Orangeburg County  
Alison Renee Lee., Circuit Court Judge

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JERENE HAYWARD,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT


APPELLATE CASE NO. 2014-000633

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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 J. Clayton Mitchell, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 7th day of November, 2014.

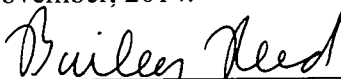


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Carmen V. Ganjehsani  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 7th day  
of November, 2014.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 24, 2021.