

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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ORIGINAL

Certiorari to Horry County  
George C. James, Jr., Circuit Court Judge

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RECEIVED

NOV 17 2014

THOMAS EARNEST WEBB,

S.C. Supreme Court  
PETITIONER

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-0001381

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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 Thomas Webb respectfully requests a **final thirty (30) day extension, until December 17, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Mr. Thomas Webb 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. **Counsel is also working in the case of State v. Ricky Lee Blackwell, a direct appeal in a capital case, and the transcript is 4.751 pages long.** Counsel filed the brief of appellant in the case of State v. Joshua A. Reed with the Court of Appeals on November 13, 2014. Counsel filed the brief of appellant in the case of State v. Shawn William Sharpe with the Court of Appeals on November 12, 2014. On November 7, 2014, counsel spoke at a Seminar for South Carolina Magistrate Judges. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jamar Lavert Belk v. State of South Carolina with this Court on November 4, 2014. Counsel was a speaker during the group sessions for the Appellate Practice Project on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kelvin Jackson with the Court of Appeals on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher W. Berke with the Court of Appeals on October 29, 2014. Counsel filed the brief of appellant in the case of State v. Jessie Davis with the Court of Appeals on October 27, 2014. Counsel filed the initial reply brief in the case of State v. Lamar Sequan Brown with the Court of Appeals on October 27, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Zachary Fowler v. State of South Carolina with this Court on October 22, 2014. Counsel filed the petition for rehearing in the case of State v. Anthony Jackson with the Court of Appeals on October 14, 2014. Counsel filed the initial reply brief in the case of State v. Erick Arroyo with the Court of Appeals on October 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sterling Devonte Brown v. State of South Carolina with this Court on October 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Markelle Jamar Reid v. State of South Carolina 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 State v. Steven Kranendonk with this Court on October 6, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Jason Alan Johnson with this Court on October 3, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Greg K. Isaac with the Court of Appeals in September 26, 2014. Counsel attended and participated in the 2014 Annual Public Defender on September 22, 23, and 24, 2014. Counsel filed the brief of appellant in the case of State v. Jabriel L. Singleton with the Court of Appeals on September 19, 2014.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

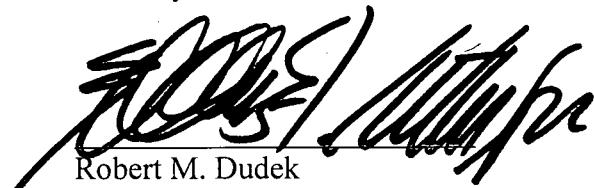
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until December 17, 2014**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander  
Appellate Defender

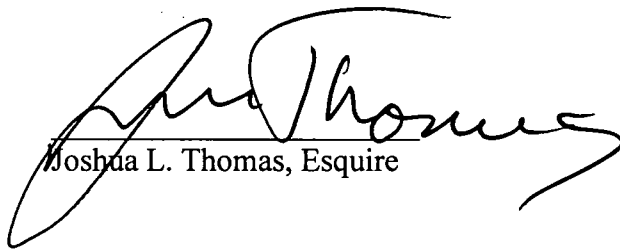
Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 17<sup>th</sup> day of November, 2014.

I consent:



Joshua L. Thomas, Esquire