

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

G. Edward Welmaker, Circuit Court Judge

RECEIVED

NOV 17 2014

S.C. Supreme Court

GREGORY GOSNELL,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001068

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

Counsel respectfully requests a thirty day extension in which to file the petition for writ of certiorari 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 is due to be served and filed with the Court today.

2. Counsel 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. On November 13, 2014, counsel filed a brief of respondent in State v. Brittany Johnson with this Court. On November 12, 2014, counsel held an oral argument in State v. Demetrius Smalls before the Court of Appeals. On November 5, 2014, counsel filed a brief of appellant and record on appeal in State v. Latroy Lamar Wherry with the Court of Appeals. On October 27, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Michael Lee Montgomery v. State with this Court. On October 27, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Kevin L. Holt v. State with this Court. On October 23, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Aaron Green v. State with this Court. On October 21, 2014, counsel filed a brief of respondent in Troy Robinson v. State with the Court of Appeals. On October 16, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in John G. Kimble v. State with this Court. On October 15, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Steven Burton v. State with this Court. On October 13, 2014, counsel filed a brief of petitioner in State v. Antonio Scott with this Court. On October 8, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Shaquan Burgess v. State with this Court. On October 3, 2014, counsel filed a brief of appellant and record on appeal in State v. David Wayne Thompkins with the Court of Appeals. On October 2, 2014, counsel filed a brief of appellant and record on appeal in State v. Noeshea F. Samuel with the Court of Appeals. On September 30, 2014, counsel filed an initial brief of appellant and record on appeal in State v. John William Dobbins with the Court of Appeals. On September 17, 2014, counsel filed a brief of appellant and record on appeal in State v. Deshawn Foster with the Court of Appeals. On September 17, 2014, counsel filed a

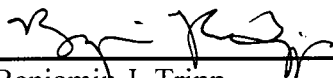
petition for writ of certiorari and accompanying appendix in Shalla Marshall v. State with this Court. On September 15, 2014, counsel filed a petition for writ of certiorari and accompanying appendix in Eddie Pilcher v. State with this Court.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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 in this case based upon the above exigent circumstances.

Respectfully submitted,



Benjamin J. Tripp
Appellate Defender

Attorney for Petitioner

November 17, 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

GREGORY GOSNELL,

PETITIONER,

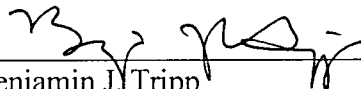
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

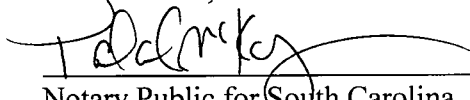
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Karen Ratigan, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 17th day of November, 2014.



Benjamin J. Tripp
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 17th day
of November, 2014



(L.S.)
Notary Public for South Carolina
My Commission Expires: July 24, 2022.