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STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

S.C. Supreme Court

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Certiorari to Aiken County  
R. Ferrell Cothran Jr., Circuit Court Judge

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RUSTY DUNBAR,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000565

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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 Rusty Dunbar 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:

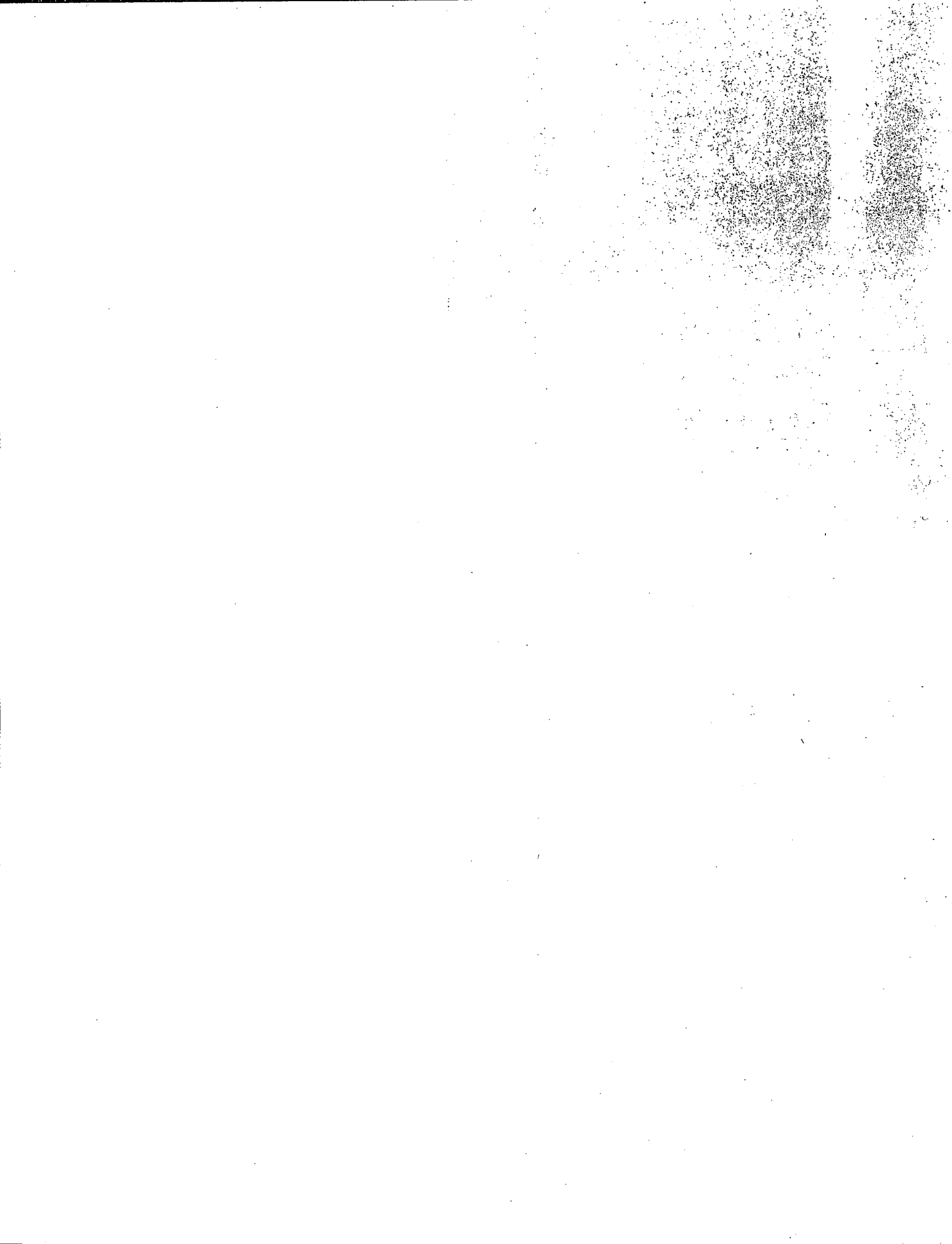
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Rusty Dunbar respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. Counsel is filing today the petition for writ of certiorari and accompanying appendix in the case of Carmichael Flowers v. State of South Carolina with this Court. Counsel filed the petition for writ of certiorari and accompanying appendix to the Court of Appeals in the case of The State v. Roderick Pope with this Court on November 13, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William Yarborough v. State of South Carolina with this Court on November 12, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Midrevius Amone Brown with the Court of Appeals on November 7, 2014. Counsel filed the petition for writ of certiorari in the case of Curtis Randall Sweatt, Jr. v. State of South Carolina with this Court on November 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Alfonzo Alexander with the Court of Appeals on November 4, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Noel Michael Lyles v. State of South Carolina with this Court on October 30, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ramon Atienzo-Perez v. State of South Carolina with this Court on September 30, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jimmy D. Meggs v. State of South Carolina with this Court on September 29, 2014. Counsel had an oral argument in the case of The State v. Kevin Shane Epting in this Court on September 25, 2014. Counsel attended and participated in the 2014 Annual Public Defender on September 22, 23, and 24, 2014.

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

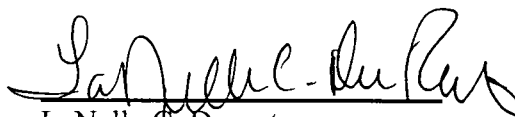
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a 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, appearing to read "LaNelle C. Durant", written over a horizontal line.

LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner

November 20<sup>th</sup>, 2014

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Aiken County  
R. Ferrell Cothran Jr., Circuit Court Judge

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RUSTY DUNBAR,

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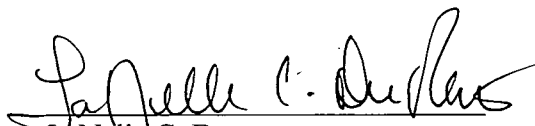
RESPONDENT

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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 Daniel Gourley, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 20<sup>th</sup> day of November, 2014.

  
LaNelle C. Durant  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 20<sup>th</sup> day  
of November, 2014.

  
\_\_\_\_\_(L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 3, 2023.