

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

D. Garrison Hill, Circuit Court Judge

RECEIVED

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S.C. Supreme Court

JONATHAN M. CAMPBELL,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001428

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the petition for rehearing in the case of State v. Alexander Hunsberger in the Court of Appeals on November 20, 2014. Counsel filed the petition

for rehearing in the case of State v. Ralph B. Hayes in the Court of Appeals on November 20, 2014. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of State v. Wayne Stewart Curry in this Court on November 19, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Tyrel Collins in the Court of Appeals on November 17, 2014. Counsel filed the Anders brief of Appellant and designation of matter with the Record on Appeal in the case of State v. Javan Mays in the Court of Appeals on November 12, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Ernest Eugene Williams, Jr. in the Court of Appeals on November 10, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eddie Pilcher v. State in this Court on November 5, 2014. Counsel argued in the case of State v. Christopher J. Shippy in the Court of Appeals on November 4, 2014. Counsel argued in the case of State v. Darryl L. Drayton in the Court of Appeals on November 3, 2014. Counsel attended at the Appellate Practice Project CLE on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Alan L. Burns in the Court of Appeals on October 30, 2014. Counsel attended a PCR hearing in Beaufort County in the case of Leslie Twyman v. State before the Honorable Judge Edgar Dickson on October 29, 2014. Counsel filed the brief of petitioner in the case of State v. Julia Gorman with this Court on October 24, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert Odell Brown in the Court of Appeals on October 16, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Delonte Carroll v. State in this Court on October 14, 2014. Counsel filed the brief of petitioner in the case of Anthony Sanders v.

State in this Court on October 13, 2014. Counsel filed the brief of petitioner in the case of Eunice McCall v. State in this Court on October 13, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael E. Hyatt in the Court of Appeals on October 10, 2014. Counsel filed the petition for rehearing in the case of State v. Desmond Sams in this Court on October 9, 2014. Counsel argued the case of State v. Marty Baggett in the Court of Appeals on October 6, 2014. Counsel filed the brief of petitioner in the case of Michael D. Hall v. State in this Court on October 6, 2014. Counsel filed the Anders brief of Appellant and designation of matter with the Record on Appeal in the case of State v. Courtney Michelle Woodard in the Court of Appeals on October 6, 2014. Counsel filed the petition for writ of certiorari in the case of Bernard O. Gilliard v. State in this Court on September 30, 2014. Counsel filed the petition for writ of certiorari in the case of State v. Douglas Bret Bishop in this Court on September 30, 2014. Counsel filed a petition for re-hearing in a capital case, Richard Moore v. State on September 26, 2014. On September 22-24, 2014, counsel attended the Public Defender Conference in Myrtle Beach, South Carolina. Counsel filed the petition for writ of certiorari in the case of State v. Clarence Williams Jenkins in this Court on September 24, 2014.

3. This request is made in good faith, and not for purposes of delay.

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. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

Susan B. Hackett

Susan B. Hackett
Appellate Defender

November 20, 2014

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
D. Garrison Hill, Circuit Court Judge

JONATHAN M. CAMPBELL,

PETITIONER,

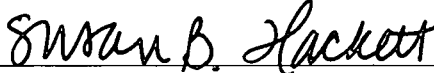
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

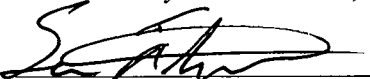
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Karen Ratigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 20th day of November, 2014.



Susan B. Hackett
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
This 20th day of November, 2014.



(L.S.)
Notary Public for South Carolina
My Commission Expires: October 30, 2022.