

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Pickens County

D. Garrison Hill, Circuit Court Judge

RECEIVED

DEC 5 2014

S.C. Supreme Court

ROBERT LEE DEAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2014-001313

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

Counsel for Robert Lee Dean respectfully requests a **final thirty (30) day extension, until January 5, 2015**, 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. Dean 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 filed the petition for rehearing in the case of State v. Dominique Shumate with the Court of Appeals on December 1, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Craig Rolen v. State with this Court on November 24, 2014. Counsel filed the petition for rehearing in the case of State v. Julio Hunsburger with the Court of Appeals on November 20, 2014. Counsel had an oral argument in the case of Demetrius Price v. State in this Court on November 20, 2014. Counsel filed the Reply to Brief of Respondent in the case of Darryl Frierson v. State with the Court of Appeals on November 18, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donald Jones v. State with this Court on November 17, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Julius Curry with the Court of Appeals on November 12, 2014. Counsel filed the reply to the state's return to petition for writ of certiorari in the case of Milo Tudor v. State with this Court on November 6, 2014. Counsel filed the initial reply brief of appellant in the case of State v. Marquis Robinson with the Court of Appeals on November 5, 2014. Counsel filed a petition for writ of certiorari in the case of Donta Kevon Reid v. State of South Carolina with the United this Court on November 4, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gowndell Cades with the Court of Appeals on October 24, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Todd Burgess v. State with this Court on October 22, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Rufus Raiden with the Court of Appeals on October 20, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Thomas Porter v. State

with this Court on October 20, 2014. Counsel had an oral argument in the case of State v. James Scofield in the Court of Appeals on October 15, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sammy Scott v. State with this Court on October 7, 2014. Counsel had an oral argument in the case of State v. Dominique Shumate in the Court of Appeals on October 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Latrone Butler 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 consents to this request as shown by signature below.

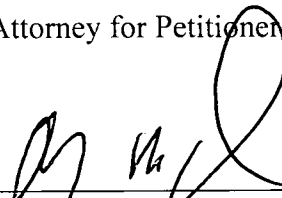
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until January 5, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Kathrine H. Hudgins
Appellate Defender

Attorney for Petitioner

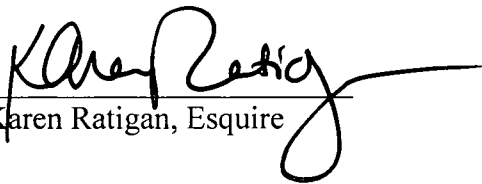


Robert M. Dudek
Chief Appellate Defender

This 5th day of December, 2014.

This 5th day of December, 2014.

I consent:


Karen Ratigan, Esquire