

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Alison Renee Lee, Circuit Court Judge

RECEIVED

DEC 8 2014

S.C. Supreme Court

JERENE HAYWARD,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2014-000633

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

The undersigned counsel respectfully requests a **final thirty day extension, until January 8, 2015**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the White v. State brief of appellant in the case of State v. Willie Pelzer with this Court on December 5, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Favian Hayes v. State with this Court on November 24,

2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Elizabeth Dinkins v. State with this Court on November 24, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian White v. State with this Court on November 21, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Marcus Greene v. State with this Court on November 21, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Shawn Phillips v. State with this Court on November 19, 2014. Counsel filed the petition for rehearing in the case of State v. Darrell Birch with the Court of Appeals on November 13, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Isaac Lyles with the Court of Appeals on November 12, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Xavier Perry v. State with this Court on November 10, 2014.

3. As indicated by his consent below, counsel for the state does not oppose this request.

4. This request is made in good faith, and not for purposes 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.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until January 8, 2015**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



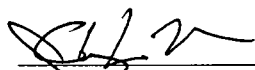
Carmen V. Ganjehsani
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

December 8, 2014

I do not oppose:



J. Clayton Mitchell