

CONFIDENTIAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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DEC 8 2014

Certiorari to Oconee County  
Alexander S. Macaulay, Circuit Court Judge

S.C. Supreme Court

THE STATE,

RESPONDENT,

v.

CHARLES MONROE HARRIS,

PETITIONER.

APPELLATE CASE NO. 2014-001236

MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE BRIEF OF PETITIONER

Counsel for Charles Monroe Harris respectfully requests a one-time only extension of twenty (20) days, **until December 29, 2014**, in which to file the brief of petitioner in this case based on the following good cause, and extraordinary circumstances. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The brief of petition is due to be served and filed with the Court today.
2. Counsel for Charles Monroe Harris respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.
3. Counsel is filing the petition for writ of certiorari and accompanying appendix in the case of Tommy Toomer v. State of South Carolina with the this Court today, December 8, 2014. Counsel also has an oral argument in the case of Michael A. Hough v. The State, which he is assisting Appellate Defender Lara Caudy in preparing to argue for him before in the Court of

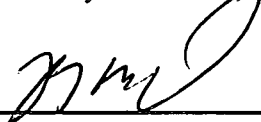
Appeals today, December 8, 2014. Counsel also has an oral argument in the case of Michael D. Hall v. State of South Carolina, et al. before this Court tomorrow, December 9, 2014, and an oral argument in the case of The State v. Derrick McDonald before this Court on December 11, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Laborse Macon with the Court of Appeals on December 5, 2014. Counsel filed the petition for writ of certiorari in the case of The State v. Michael Rogers with this Court on December 4, 2014. Counsel filed the petition for writ of certiorari in the case of The State v. Jefferson Perry with this Court on December 4, 2014. Counsel filed the petition for writ of certiorari in the case of The State v. Anthony K. Blakney with this Court on December 4, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Ryan P. Deleston with the Court of Appeals on December 3, 2014. Counsel filed the petition for rehearing in the case of The State v. Antonio Miller with the Court of Appeals on December 1, 2014. Counsel filed the United States certiorari petition in the case of Bayan Aleksey v. State of South Carolina on November 24, 2014. Counsel filed the petition for writ of certiorari in the case of Richard Keith Poe v. State of South Carolina with this Court on November 21, 2014. Counsel attended a PCR Hearing on November 18, 2014 in Richland County in the case of Quincy Jovan Allen v. The State. Counsel filed the petition for writ of certiorari in the case of Sammie Louis Stokes v. State of South Carolina (death penalty case) with this Court on November 12, 2014. Counsel gave a presentation that he continued to prepare for after doing the materials on the Fourth Amendment for the Summary Judge's Conference on November 7, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Bradley Gerald Mullins with the Court of Appeals on November 4, 2014. Counsel filed a petition for stay of execution in the case of The State v. Richard Moore with this Court on October 31, 2014.

Counsel presented the Appellate Project CLE on October 30, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Victor White with this Court on October 30, 2014. Counsel attended a PCR hearing on October 29, 2014 in Dorchester County in the case of Walter Lee Harris v. State of South Carolina. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Tawanda Allen with this Court on October 27, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of Timothy D. Dingle v. The State (murder case) with the Court of Appeals on October 22, 2014. Counsel filed the petition for rehearing in the case of The State v Jason A. Bauman with the Court of Appeals on October 16, 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 twenty day extension, **until December 29, 2014**, in which to file the brief of petitioner in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
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Robert M. Dudek  
Chief Appellate Defender

Attorney for Petitioner

December 8, 2014

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THE STATE,

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CERTIFICATE OF SERVICE

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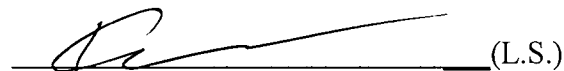
I certify that a true copy of the motion for an extension of time in which to file the brief of petitioner in the above case has been served upon Deborah R. J. Shupe, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 8<sup>th</sup> day of December, 2014.



Robert M. Dudek  
Chief Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 8<sup>th</sup> day  
of December, 2014..

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: August 21, 2023.