

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Georgetown County  
George C. James Jr., Circuit Court Judge

---

RECEIVED

DEC 8 2014

S.C. Supreme Court

VLADIMIR PANTOVICH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001433

---

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

---

Counsel for Vladimir Pantovich 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 Vladimir Pantovich 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 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.

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, consisting of a large, stylized 'C' followed by a horizontal line and a few more strokes.

---

Carmen V. Ganjehsani  
Appellate Defender

Attorney for Petitioner

December 8, 2014

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Georgetown County  
George C. James Jr., Circuit Court Judge

---

VLADIMIR PANTOVICH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001433

---

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 Joshua L. Thomas, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 8th day of December, 2014.

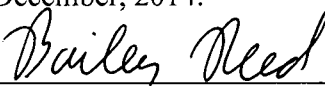


---

Carmen V. Ganjehsani  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 8th day  
of December, 2014.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 24, 2021.