

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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DEC 22 2014

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

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 **final** thirty-day extension, until **January 21, 2015** 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 two prior orders of this Court.
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Steven Otts in the Court of Appeals on December 22, 2014. On December 10, 2014, counsel traveled to Lieber Correctional Institution to attend the deposition of one of her clients involving a civil suit arising out of the criminal charges.

On December 9, 2014, Counsel who was on brief attended the oral argument in the case of State v. Michael Hall in this Court. Counsel argued in the case of Michael Gonzales v. State in the Court of Appeals on December 8, 2014. Counsel filed the Anders brief of Appellant and designation of matter with the Record on Appeal in the case of State v. Sean Phillip Smith in the Court of Appeals on December 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Russell Sims v. State in this Court on December 1, 2014. Counsel filed the petition for rehearing in the case of State v. Mathew Fullbright in the Court of Appeals on December 1, 2014. Counsel attended and spoke at the Public Defense 101: Fundamentals of the Profession seminar on November 25, 2014. 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.

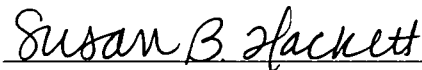
Counsel argued in the case of State v. Darryl L. Drayton in the Court of Appeals on November 3, 2014. Counsel attended at the Appellate Practice Project CLE on October 30, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Alan L. Burns in the Court of 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.

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

4. As indicated by her consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final** thirty-day extension, until **January 21, 2015** 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
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

December 22, 2014

I DO NOT OPPOSE:



Karen Ratigan