

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Alison Renee Lee, Circuit Court Judge

RECEIVED

JAN - 5 2015

S. C. Supreme Court

JEREMY BATTS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000840

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

The undersigned counsel would respectfully request a **final thirty-day extension, until February 4, 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 petition for rehearing in the case of State v. Ubaldo Garcia with the Court of Appeals on December 19, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David C. Carson v. State in

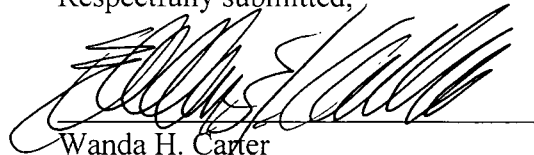
this Court on December 11, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darrin Bryant v. State in this Court on December 8, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Mykel Watkins v. State in this Court on December 5, 2014. Counsel filed the brief of petitioner in the case of Christopher Bernard Anderson v. State in this Court on November 24, 2014. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Derrick A. McIlwain in this Court on November 24, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Anthony Stewart v. State in this Court on November 19, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Andrew J. Mack v. State in this Court on November 18, 2014. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Michael P. Dixon in the Court of Appeals on November 18, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon Croft v. State in this Court on November 17, 2014. Counsel filed the brief of petitioner-respondent in the case of Thomas Osborne v. State in the Court of Appeals on November 17, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Douglas Hall v. State in this Court on November 12, 2014. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Michael Robert Bishop in the Court of Appeals on November 12, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Andrea Waylisha White v. State in this Court on November 7, 2014.

3. This request is made in good faith, and not for purposes of delay. Counsel is striving to limit the number of extensions requested. Counsel is attempting to complete the cases with the most number of extensions first.

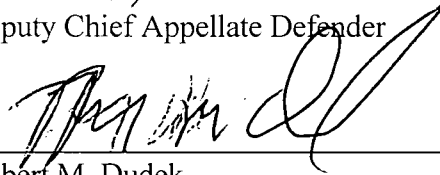
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until February 4, 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,




Wanda H. Carter
Deputy Chief Appellate Defender



Robert M. Dudek
Chief Appellate Defender

January 5, 2015

I DO NOT OPPOSE:



Clay Mitchell