

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

ORIGINAL

\_\_\_\_\_  
Certiorari to Richland County  
Alison Renee Lee, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

DEC 3 2014

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 thirty-day extension 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 one prior order of this Court.
2. Counsel filed the brief of petitioner in the case of Christopher Bernard Anderson v. State in the Supreme Court on November 24, 2014. Counsel filed the

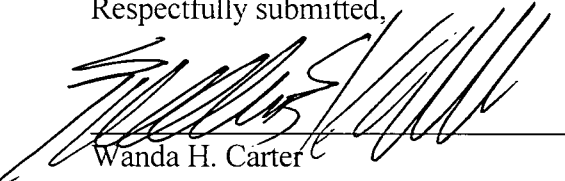
petition for writ of certiorari to the Court of Appeals in the case of State v. Derrick A. McIlwain in the Supreme Court on November 24, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Anthony Stewart v. State in the Supreme Court on November 19, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Andrew J. Mack v. State in the Supreme 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 the Supreme 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 the Supreme 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 the Supreme Court on November 7, 2014. Counsel argued in the case of State v. Brian E. Lorick, Jr. in the Court of Appeals on November 4, 2014. Counsel argued in the case of State v. Ubaldo Garcia in the Court of Appeals on November 3, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio Calloway v. State in the Supreme Court on October 20, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Oneil Robinson v. State in the Supreme Court on October 20, 2014. Counsel filed the petition for rehearing in the case

of State v. Derrick A. McIlwain in the Court of Appeals on October 9, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leonard Roper v. State in the Supreme Court on October 8, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin Ware v. State in the Supreme Court on October 8, 2014.

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

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. 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  
Appellate Defender

December 3, 2014

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Certiorari to Richland County

Alison Renee Lee, Circuit Court Judge

---

JEREMY BATTS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

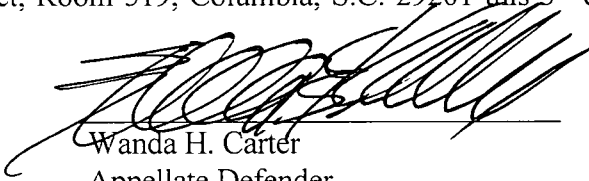
RESPONDENT

---

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 Clay Mitchell, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 3<sup>rd</sup> day of December, 2014.

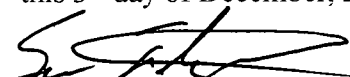


---

Wanda H. Carter  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 3<sup>rd</sup> day of December, 2014.



---

(L.S.)

Notary Public for South Carolina

My Commission Expires: October 30, 2022.