

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

RECEIVED

Certiorari to York County

JAN - 7 2015

G. Edward Welmaker, Circuit Court Judge
S.C. Supreme Court

JOHN WILLIAM DIXON

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-002193

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

The undersigned counsel respectfully requests a **final six (6) day extension, until January 13, 2015**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. **Counsel will attempt to file the petition on Friday, January 9, 2015 or before the due date if at all possible.** In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. **Counsel regrets having to request this very short fourth extension. However, counsel is working on and will be filing the initial brief of appellant and designation of matter in the death penalty case of The State v. Ricky Lee Blackwell with**

this Court on January 8, 2015. Therefore, all of counsel's time until January 8, 2015 will be devoted solely to that case. Counsel also has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight.

3. Counsel filed the petition for rehearing in the case of The State v. Victor Weldon with the Court of Appeals on December 31, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Torren Marquize Eady with the Court of Appeals on December 22, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rodney Thompson v. State of South Carolina with this Court on December 19, 2014. Counsel filed the brief of petitioner in the case of The State v. Charles Monroe Harris with this Court on December 18, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Martha Elizabeth Hale with the Court of Appeals on December 16, 2014. Counsel filed the initial brief of respondent and designation of matter in the case of The State v. Marcus Greene with the Court of Appeals on December 12, 2014. Counsel had an oral argument in the case of The State v. Derrick McDonald before this Court on December 11, 2014. Counsel also filed the brief of petitioner in the case of The State v. South Carolina v. Manuel Marin with co-counsel David Alexander with this Court on December 11, 2014. Counsel had an oral argument in the case of Michael D. Hall v. State of South Carolina, et al. before this Court on December 9, 2014. Counsel had an oral argument in the case of Michael A. Hough v. The State which he assisted Appellate Defender Lara Caudy in preparing to argue for him before the Court of Appeals on December 8, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tommy Toomer v. State of South Carolina with this Court on December 8, 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.

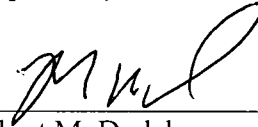
4. As indicated by his consent below, counsel for the state does not oppose this request.

5. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.


WHEREFORE, the undersigned counsel would respectfully request a **final six (6) day extension, until January 13, 2015**, in which to file the petition for writ of certiorari and accompanying appendix. **Counsel will attempt to file the petition on Friday, January 9, 2015 or before the due date if at all possible.** Counsel respectfully requests that the time limits for filing

the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



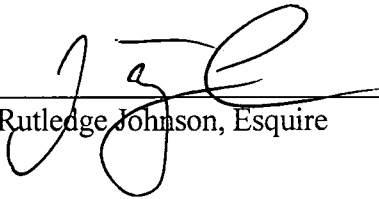
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director
J. Hugh Ryan, III
General Counsel

This 7th day of January, 2015.

I do not oppose:



J. Rutledge Johnson, Esquire