

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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

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RECEIVED

JAN 15 2015

S.C. Supreme Court

BILLY JOE HANNAH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001517

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

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Counsel for Billy Joe Hannah respectfully requests an extension of thirty (30) days, **until February 16, 2015**, 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 Billy Joe Hannah 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 his caseload, counsel hopes that no further extension requests will be required.

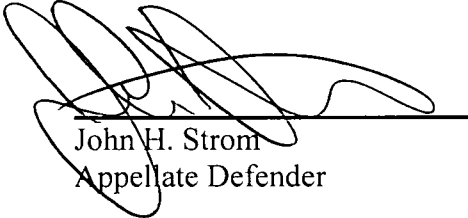
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. James Clyde Dill, Jr., with the Court of Appeals on January 12, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dominique Julius Agurs with the Court of Appeals on January 9, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin K. Fowler v. State of South Carolina with this Court on January 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jarvis Gibbs v. State of South Carolina with this Court on January 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Phillip Fleming Watts v. State of South Carolina with this Court on January 7, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jacob Heyward Seay 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. Jay C. Carr with the Court of Appeals on December 31, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael A. Smith v. State of South Carolina with this Court on December 29, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher Johnson v. State of South Carolina with this Court on December 22, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher T. Gamble with the Court of Appeals on December 17, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donald W. Wichmann v. State of South Carolina with this Court on December 15, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Erik Morrow v. State

of South Carolina with this Court on December 5, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ila Michelle Carter v. State of South Carolina with this Court on December 1, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian Darby v. State of South Carolina with this Court on November 26, 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, **until February 16, 2015**, 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,



John H. Strom  
Appellate Defender

ATTORNEY FOR PETITIONER

This 15<sup>th</sup> day of January, 2015.

STATE OF SOUTH CAROLINA  
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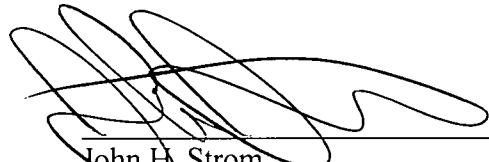
APPELLATE CASE NO. 2014-001517

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CERTIFICATE OF SERVICE

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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 Karen Ratigan, Senior Assistant Deputy Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 15<sup>th</sup> day of January, 2015.

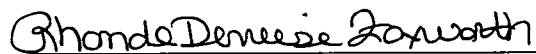


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John H. Strom  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 15<sup>th</sup> day  
of January, 2015.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: October 17, 2021