

STATE OF SOUTH CAROLINA

ORIGINAL

IN THE SUPREME COURT

Certiorari to Dorchester County
Edgar W. Dickson, Circuit Court Judge

RECEIVED

JAN 16 2015

S.C. Supreme Court

THE STATE,

RESPONDENT,

V.

JASON BAUMAN,

PETITIONER.

2012-212285

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

The undersigned counsel respectfully requests a **single ten (10) day extension, until January 26, 2015**, pursuant to this Court's order of July 16, 2014 in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. 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 filed a reply brief to the state's brief in opposition to the petition for writ of certiorari yesterday, January 15, 2015, in the death penalty case of Bayan Aleksey v. State of South Carolina with the United States Supreme Court on January 15, 2015. Counsel filed the petition for writ of certiorari, and the brief of appellant pursuant to White v. State in the case of John William Dixon v. State of South Carolina with this Court on January 13, 2015. Counsel, along with co-counsel, filed the initial brief of appellant and designation of matter (7 issues) in

the death penalty case of The State v. Ricky Lee Blackwell with this Court on January 8, 2015. 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, 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

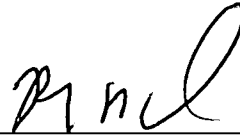
initial brief of appellant and designation of matter in the case of The State v. Ryan P. Deleston with the Court of Appeals on December 3, 2014. Counsel filed the petition for rehearing in the case of The State v. Antonio Miller with the Court of Appeals on December 1, 2014. Counsel filed the United States certiorari petition in the case of Bayan Aleksey v. State of South Carolina on November 24, 2014. **Counsel also has extensive administrative duties as the Chief Appellate Defender, including administrative oversight and advice on Appellate Project cases.**

3. 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 -- and obviously will adjust to the new extension order --- so that the caseload will hopefully become more manageable in the near future and less extensions will need to be requested.

4. Opposing counsel for the Attorney General's office, David Spencer, kindly consents or does not oppose this request as shown by signature below.

WHEREFORE, for the above-mentioned reasons, and **as a showing of good cause**, the undersigned counsel would respectfully request a **single ten-day extension, until January 26, 2015**, in which to serve and file the petition for writ of certiorari and accompanying appendix. 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,



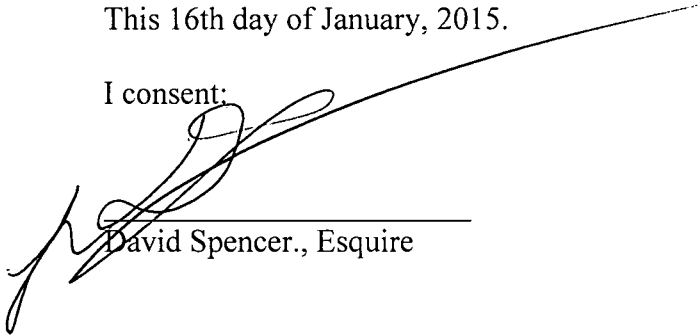
Robert M. Dudek
Chief Appellate Defender



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

This 16th day of January, 2015.

I consent:



David Spencer., Esquire