

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Williamsburg County  
R. Ferrell Cothran Jr., Circuit Court Judge

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**RECEIVED**

JAN 29 2015

**S.C. Supreme Court**

RONALD MACK,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001518

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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 Ronald Mack respectfully requests an extension of thirty (30) days 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 Ronald Mack 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 her caseload, counsel hopes that no further extension requests will be required.

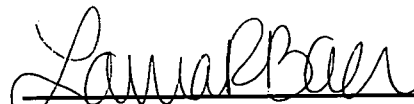
3. Counsel filed the brief of respondent in the case of State v. Ashley Moore with the Supreme Court on January 21, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ethan Mack v. State with this Court on January 12, 2015. Counsel filed the brief of respondent in the case of State v. Alex Robinson with this Court on January 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jerene Hayward v. State with this Court on January 7, 2015. Counsel had an oral argument in the case of State v. Conrad Slocumb in the Court of Appeals on January 6, 2015. Counsel had oral argument in the case of State v. Rajerick Knight in the Court of Appeals on January 5, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny Crockett v. State with this Court on December 19, 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, 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,



Laura R. Baer  
Appellate Defender

Attorney for Petitioner

January 29, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Williamsburg County  
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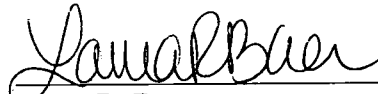
APPELLATE CASE NO. 2014-001518

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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 Daniel Gourley, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 29th day of January, 2015.



Laura R. Baer  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 29th day  
of January, 2015.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 24, 2021.