

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Lancaster County

William Jeffrey Young, Circuit Court Judge  
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ORIGINAL

**RECEIVED**

JAN 29 2015

**S.C. Supreme Court**

KEITH ROBINSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002103  
\_\_\_\_\_

**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. On January 27, 2015, Counsel attended a hearing as a witness before the Commission on Lawyer Conduct pursuant to a subpoena. Counsel filed the petition for

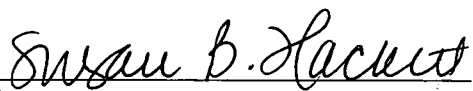
writ of certiorari and accompanying appendix in the case of Jonathan Campbell v. State in this Court on January 21, 2015. Counsel filed the reply to the return to petition for writ of certiorari in the case of Albert S. Kelly v. State in this Court on January 20, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Ralph B. Hayes in this Court on January 16, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Mathew Fullbright in this Court on January 16, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Alexander L. Hunsberger in this Court on January 16, 2015. Counsel filed the reply to the state's return to motion to remand for competency determination in the case of Drew John Monahan v. State in the Court of Appeals on January 14, 2015. Counsel argued in the case of State v. Marvin Bowens Green in the Court of Appeals on January 8, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Richard Deas v. State in this Court on January 5, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Thaddeus Curry v. State with this Court on December 29, 2014. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Steven Otts in the Court of Appeals on December 22, 2014. On December 10, 2014, counsel traveled to Lieber Correctional Institution to attend the deposition of one of her clients involving a civil suit arising out of the criminal charges. On December 9, 2014, Counsel who was on brief attended the oral argument in the case of Michael Hall v. State in this Court. Counsel filed the Anders brief of Appellant and designation of matter with the Record on Appeal in the case of State v. Sean Phillip Smith in the Court of Appeals on December 9, 2014. Counsel argued in the case of Michael Gonzales v. State in the Court of Appeals

on December 8, 2014. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Russell Sims v. State in this Court on December 1, 2014. Counsel filed the petition for rehearing in the case of State v. Mathew Fullbright in the Court of Appeals on December 1, 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,

  
Susan B. Hackett  
Appellate Defender

January 29, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Lancaster County

William Jeffrey Young, Circuit Court Judge  
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KEITH ROBINSON,

PETITIONER,

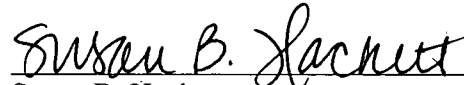
V.

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 J. Croom Hunter, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 29<sup>th</sup> day of January, 2015.

  
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Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER:

SUBSCRIBED AND SWORN TO before me  
this 29<sup>th</sup> day of January, 2015.

  
\_\_\_\_\_  
(L.S.)

Notary Public for South Carolina  
My Commission Expires: October 30, 2022.