

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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AUG 18 2012

Certiorari to Greenville County

S.C. Supreme Court

J. C. Buddy Nicholson, Jr., Circuit Court Judge

BRAD KEITH SIGMON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2009-136506

PETITION FOR EXTENSION TO FILE
THE REPLY TO BRIEF OF RESPONDENT

The undersigned counsel respectfully requests a ten-day extension in which to file the reply to the brief of respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The reply to the brief of respondent is due to be served and filed today in this **death penalty case.**

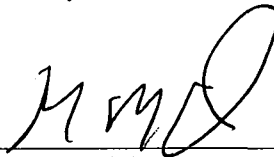
2. Counsel is preparing for the remand hearing in the case of State v. Richard Gagnon scheduled for September 4, 2012 in Horry County. In addition, Counsel is currently working on two death penalty cases: Marion Alexander Lindsey v. State (with Co-Counsel David Alexander) and James Robertson v. State (with Co-Counsel Matt Bogan, pro bono, of the Nelson Mullins firm). Counsel filed the brief of petitioner in the case of Adams Gibson v. State with the Supreme Court on July 23, 2012. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Richard Bernard Moore v. State, (capital case) with Co-Counsel Susan Hackett, with the Supreme Court on Wednesday, July 18, 2012. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles E. Copeland

v. State with the Supreme Court on July 9, 2012. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of State v. Garvin Duvall (in the COA) with the Supreme Court on June 29, 2012. Counsel filed the petition for rehearing in the case of State v. Christopher Heller in the Court of Appeals on June 28, 2012. Counsel had an oral argument in the case of State v. Derrick McDonald in the Court of Appeals on June 19, 2012. Counsel filed the petition for rehearing in the case of State v. Robert S. Jolly in the Court of Appeals on June 15, 2012. Counsel filed the initial brief of appellant and designation of matter in State v. Brandon M. with the Court of Appeals on June 13, 2012, arguing a directed verdict of acquittal should be issued. Counsel filed the petition for writ of certiorari in Jerry Buck Inman v. South Carolina with the Supreme Court of the United States on June 11, 2011. Counsel filed the brief of petitioner in the case of State v. Tracy B. with the Supreme Court on June 8, 2012. Counsel had an oral argument in the case of State v. Tommy Toomer in the Court of Appeals on June 6, 2012. Counsel filed the brief of appellant in State v. Andre T. Richardson with the Court of Appeals on June 1, 2012.

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 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 ten-day extension. Counsel respectfully requests that the time limits for filing the reply to the brief of respondent be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

August 13, 2012

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

J. C. Buddy Nicholson, Jr., Circuit Court Judge

BRAD KEITH SIGMON,

PETITIONER,

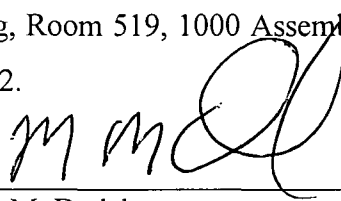
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

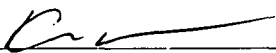
The undersigned attorney hereby certifies that a true copy of the petition for extension to file the reply to the brief of respondent in the above referenced case has been served upon Melody J. Brown, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 13th day of August, 2012.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 13th day of August, 2012.


_____(L.S.)
Notary Public for South Carolina

My Commission Expires: October 2, 2013 .