

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Berkeley County
Deadra L. Jefferson, Circuit Court Judge

RECEIVED

FEB 17 2015

JERMAINE T. MCKELVEY,

PETITIONER, *S.C. Supreme Court*

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001743

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

Counsel for Jermaine McKelvey respectfully requests a **final thirty (30) day extension, until March 19th, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Mr. Jermaine McKelvey 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.

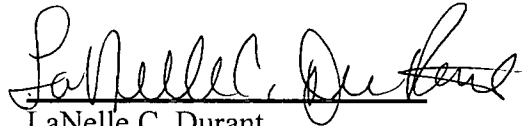
3. Counsel filed the brief of appellant in the case of The State v. Jonathan Allen Finney with the Court of Appeals on February 13, 2015. Counsel had an oral argument in the case of The State v. Daniel Demond Griffin in the Court of Appeals on February 11, 2015. Counsel had an oral argument in the case of The State v. Christopher Broadnax in this Court on February 4, 2015. Counsel filed the brief of appellant in the case of The State v. Joseph Mack, Jr. with the Court of Appeals on January 22, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rusty Dunbar v. State of South Carolina with this Court on January 16, 2015. Counsel filed the brief of petitioner in the case of Christopher O'Neal Pringle v. State of South Carolina with the Court of Appeals on January 12, 2015. Counsel filed the brief of petitioner in the case of Bruce Wilson v. State of South Carolina with this Court on January 9, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Aaron Smalls v. State of South Carolina with this Court on January 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Wayne Albeon Scott with the Court of Appeals on December 30, 2014. Counsel filed the brief of petitioner in the case of In the Matter of the Care and Treatment of Christopher Taft with this Court on December 16, 2014.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

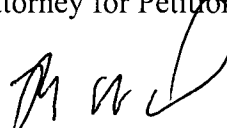
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 19th, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

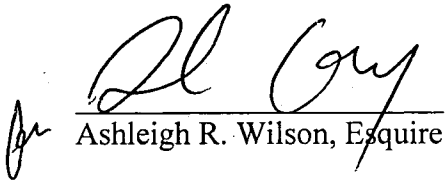
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 17th day of March, 2015.

I consent:



Ashleigh R. Wilson, Esquire