

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Chester County
William Jeffrey Young, Circuit Court Judge

RECEIVED

FEB 26 2015

S.C. Supreme Court

EARL MALCOLM BURR, II,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002072

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

Counsel for Earl Malcolm Burr, II 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 Earl Malcolm Burr, II 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.

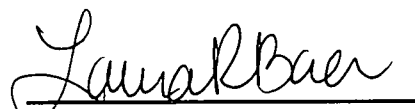
3. Counsel filed the return to petition for writ of certiorari in the case of State v. Daniel D'Angelo Jackson with this Court on February 23, 2015. filed the initial reply brief of appellant in the case of State v. Andre Decosta with the Court of Appeals, on February 18, 2015. Counsel is filing the petition for writ of certiorari and accompanying appendix in the case of Brian Stephens v. State with this Court, on February 11, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James McAbee with the Court of Appeals on February 9, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Vladimir Pantovich v. State with this Court on February 6, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Clarence Myers v. State with this Court on February 2, 2015. Counsel filed the brief of respondent in the case of State v. Ashley Moore with this 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.

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

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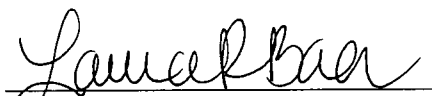
STATE OF SOUTH CAROLINA,

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CERTIFICATE OF SERVICE

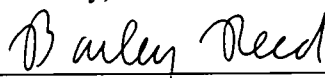
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon J. Croom Hunter, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 26th day of February, 2015.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 26th day
of February, 2015.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 24, 2021.