

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Berkeley County  
Stephanie P. McDonald, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

MAR - 4 2015

S.C. Supreme Court

GARY L. GRANT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002306

\_\_\_\_\_  
PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND ACCOMPANYING APPENDIX  
\_\_\_\_\_

The undersigned counsel respectfully requests a thirty day extension, **until April 3, 2015**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

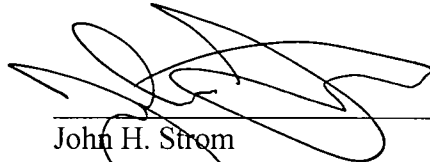
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Randy Yonson v. The State of South Carolina with this Court on February 27, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Scott Parker v. The State of South Carolina with this Court on February 20, 2015. Counsel filed the

Anders brief of appellant and designation of matter in the case of The State v. Elder Prescott Leach with the Court of Appeals on February 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Alexander Carmichael Huckabee with the Court of Appeals on February 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Bailey v. State of South Carolina with this Court on January 28, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lloyd Wright v. State of South Carolina with this Court on January 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. James Clyde Dill, Jr., with the Court of Appeals on January 12, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dominique Julius Agurs with the Court of Appeals on January 9, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin K. Fowler v. State of South Carolina with this Court on January 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jarvis Gibbs v. State of South Carolina with this Court on January 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Phillip Fleming Watts v. State of South Carolina with this Court on January 7, 2015.

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 thirty day extension. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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John H. Strom  
Appellate Defender

March 4, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Berkeley County  
Stephanie P. McDonald, Circuit Court Judge

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GARY L. GRANT,

PETITIONER,

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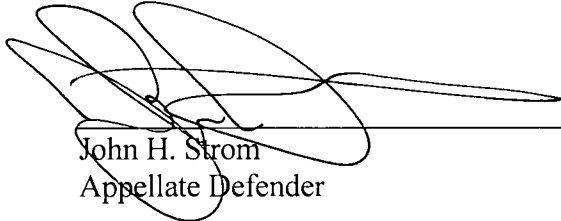
APPELLATE CASE NO. 2014-002306

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CERTIFICATE OF SERVICE

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The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Ashleigh R. Wilson, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 4th day of March, 2015.



John H. Strom  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 4th day of March, 2015.

Rhonda Derrude Foxworth (L.S.)  
Notary Public for South Carolina  
My Commission Expires: October 17, 2021.