

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Marlboro County  
R. Ferrell Cothran, Jr., Circuit Court Judge

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RECEIVED

MAR 12 2015

S.C. Supreme Court

KENWOOD BRIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001846

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

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Counsel for Kenwood Bright 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 Kenwood Bright 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.

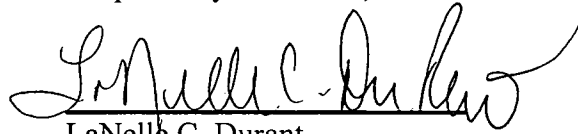
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alvin S. Samuels v. State of South Carolina with this Court on March 9, 2015. Counsel filed the brief of appellant in the case of The State v. Barry Glenn Millwood with the Court of Appeals on March 5, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jeffrey Davis with the Court of Appeals on March 4, 2015. Counsel had an oral argument in the case of The State v. Demetrius Goodwin in this Court on February 18, 2015. 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.

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,

A handwritten signature in black ink, appearing to read "LaNelle C. Durant". The signature is written in a cursive style with a horizontal line underneath it.

LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner

March 12<sup>th</sup>, 2015

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KENWOOD BRIGHT,

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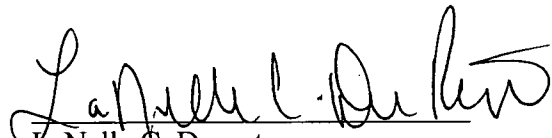
RESPONDENT

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CERTIFICATE OF SERVICE

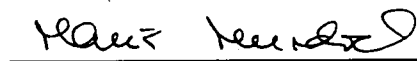
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I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Joshua L. Thomas, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 12<sup>th</sup> day of March, 2015.

  
LaNelle C. Durant  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 12<sup>th</sup> day  
of March, 2015.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 3, 2023.