

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Greenville County  
Robin B. Stilwell, Circuit Court Judge

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RECEIVED

MAR 16 2015

S.C. Supreme Court

KEVIN LEE KEITH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001952

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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 Kevin Lee Keith 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 Kevin Lee Keith 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.

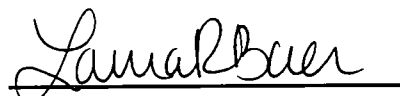
3. Counsel is filing the initial brief of appellant and designation of matter in the case of State v. Bill Breland with the Court of Appeals on March 6, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jacqueline Bacon with the Court of Appeals on March 5, 2015. Counsel had an oral argument in the case of State v. Christopher Russell in the Court of Appeals on March 2, 2015. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of State v. Daniel Jackson with this Court, on February 23, 2015. Counsel 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 filed the petition for writ of certiorari and accompanying appendix in the case of Brian Stephens v. State with this Court on February 11, 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

Attorney for Petitioner

March 16, 2015

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IN THE SUPREME COURT

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Certiorari to Greenville County  
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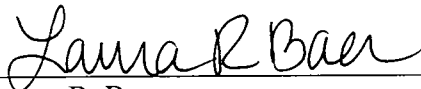
APPELLATE CASE NO. 2014-001952

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CERTIFICATE OF SERVICE

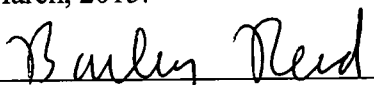
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I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Karen Ratigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 16th day of March, 2015.

  
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Laura R. Baer  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 16th day  
of March, 2015.

 (L.S.)  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: October 24, 2021.