

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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MAR 16 2015

S.C. Supreme Court

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

TRAVIS MONTGOMERY BROWN, JR.,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001874

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

The undersigned counsel respectfully requests a thirty day extension, **until April 15, 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:

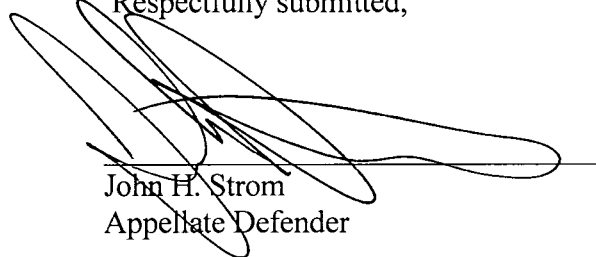
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel is working on and will be filing the petition for writ of certiorari and accompanying appendix in the case of Billy Joe Hannah v. State of South Carolina with this Court on Thursday, March 19, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Shawn Lee Wyatt with the Court of Appeals on March 4,

2015. 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 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.

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, until April 15, 2015. 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,



John H. Strom
Appellate Defender

March 16, 2015

STATE OF SOUTH CAROLINA

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Robin B. Stilwell, Circuit Court Judge

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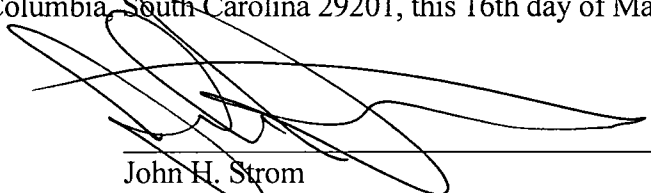
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RESPONDENT

APPELLATE CASE NO. 2014-001874

CERTIFICATE OF SERVICE

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 Karen Ratigan, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 16th day of March, 2015.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 16th day of March, 2015.

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