

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Marion County
Michael G. Nettles, Circuit Court Judge

STATE OF SOUTH CAROLINA,

PETITIONER,

v.

LETRON DAVIS,

RESPONDENT

APPELLATE CASE NO. 2014-001631

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

Counsel for Letron Davis respectfully requests an extension of thirty (30) days in which to file the return to petition for writ of certiorari 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 return to petition for writ of certiorari are due to be served and filed with the Court today.
2. Counsel for Letron Davis 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.

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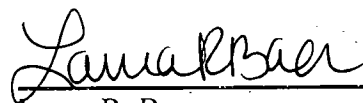
3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Bill Breland with the Court of Appeals on March 6, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jacqueline Bacon with the Court of Appeals on March 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 the Supreme 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 the Supreme 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..

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 return to petition for writ of certiorari 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 Respondent

March 23, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Marion County
Michael G. Nettles, Circuit Court Judge

STATE OF SOUTH CAROLINA,

PETITIONER,

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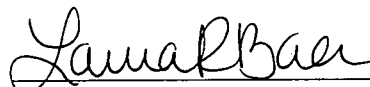
LETRON DAVIS,

RESPONDENT

APPELLATE CASE NO. 2014-001631

CERTIFICATE OF SERVICE

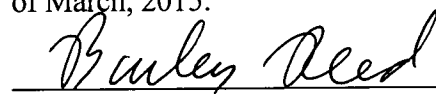
I certify that a true copy of the motion for an extension of time in which to file the return to petition for writ of certiorari in the above case has been served upon Joshua L. Thomas, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 23rd day of March, 2015.



Laura R. Baer
Appellate Defender

ATTORNEY FOR RESPONDENT

SWORN TO BEFORE ME this 23rd day
of March, 2015.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: October 24, 2021.