

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

D. Garrison Hill, Circuit Court Judge

RECEIVED

APR 8 2015

S.C. Supreme Court

JAQUES JAMAR SULLIVAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002008;

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

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel will file the petition for writ of certiorari and accompanying appendix in the case of Sean Echols v. State in the Supreme Court today. Counsel filed

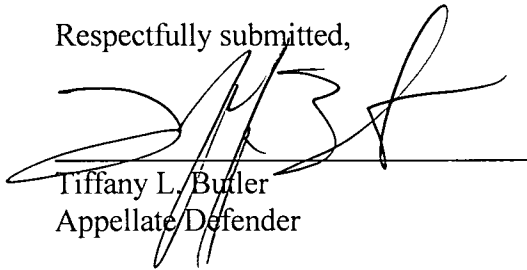
the brief of appellant and designation of matter in the case of State v. Phillip Hollingsworth in the Court of Appeals on April 1, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Lashad Demond Brewton in the Court of Appeals on March 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffrey N. Grimes v. State in the Supreme Court on March 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in Mark McCoy v. State with the Supreme Court on March 25, 2015. Counsel filed the brief of appellant and record on appeal in State v. Vincent Missouri in the Court of Appeals on March 23, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christina Hudson v. State in the Supreme Court on March 16, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Richard Todd Culbertson in the Court of Appeals on March 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Leonard Stanfield v. State in the Supreme Court on March 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Forest Ham, Jr. v. State in the Supreme Court on March 4, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Barry Jerrod Stanley in the Court of Appeals on February 20, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. Devon S. Thomas in the Court of Appeals on February 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dashaud Luck v. State in the Supreme Court on February 17, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eric Sumter v. State in the Supreme Court on February 13, 2015. Counsel filed the initial brief of appellant and

designation of matter in the case of State v. Timothy Frady in the Court of Appeals on February 11, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Donte Samar Brown in the Court of Appeals on February 9, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. James Patrick Smith in the Court of Appeals on February 9, 2015.

3. This request is made in good faith, and not for purposes of delay.

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. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. Butler', is written over a horizontal line. The signature is stylized and cursive.

Tiffany L. Butler
Appellate Defender

April 8, 2015

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CERTIFICATE OF SERVICE

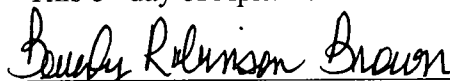
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Karen Ratigan, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 8th day of April 2015.



Tiffany L. Butler
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
This 8th day of April 2015

 (L.S.)

Notary Public for South Carolina

My Commission Expires: December 9, 2024.