

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Richland County  
Richland, Circuit Court Judge

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RECEIVED

APR 13 2015

S.C. Supreme Court

MIAMA KROMAH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2014-001294

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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 Miama Kromah respectfully requests a **final thirty (30) day extension, until May 13, 2015**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Ms. Miama Kromah 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel had an oral argument in the case of State v. Manuel Marin before this Court on April 8, 2015, as co-counsel with Robert M. Dudek. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Terrell Gilyard with the Court of Appeals on March 26, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Kevin Bethel with the Court of Appeals on March 26, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Dominique Lavar Williams with the Court of Appeals on March 9, 2015. Counsel filed the brief of appellant in the case of State v. Tyrell Woods with the Court of Appeals on March 6, 2015. Counsel filed petition for rehearing in the case of State v. Akeem O. Smith with the Court of Appeals on March 4, 2015. Counsel filed the brief of appellant in the case of State v. Gerald R. Williams in the Court of Appeals on February 27, 2015. Counsel filed the brief of appellant in the case of State v. Joseph Anthony Drachslin, Sr. in the Court of Appeals on February 27, 2015. On February 26, 2015, along with co-counsel Robert M. Dudek, counsel filed a Petition for Extraordinary Relief in this Court in the capital case of Marion Alexander Lindsey v. State. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Quinton Dewayne Inman v. State of South Carolina with this Court on February 13, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert Wilson Woods with the Court of Appeals on February 12, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Edgar B. Merrifield 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 consents to this request as shown by signature below.

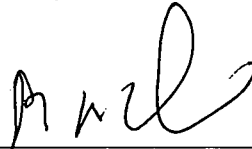
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until May 13, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander  
Appellate Defender

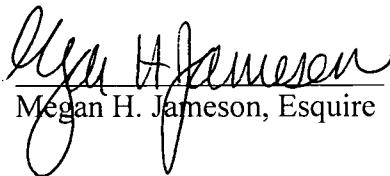
Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 13<sup>th</sup> day of April, 2015.

I consent:



Megan H. Jameson, Esquire