

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Marlboro County
R. Ferrell Cothran, Jr., Circuit Court Judge

RECEIVED

APR 13 2015

KENWOOD BRIGHT,

S.C. Supreme Court

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2014-001846

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

Counsel for Kenwood Bright 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 Mr. Kenwood Bright 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.

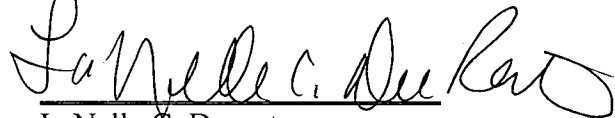
3. Counsel has an oral argument in the case of The State v. Steve Young in the Court of Appeals today. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Christopher Taft in this Court on April 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Arthur Moseley with the Court of Appeals on April 1, 2015. Counsel filed the brief of appellant in the case of The State v. Benjamin Lavon Smalls with the Court of Appeals on March 25, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Yashawnus L. Patterson v. State of South Carolina with this Court on March 24, 2015. Counsel filed the brief of appellant in the case of The State v. Andre Green with the Court of Appeals on March 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jermaine T. McKelvey v. State of South Carolina with this Court on March 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alvin S. Samuels v. State of South Carolina with this Court on March 9, 2015. Counsel filed the brief of appellant in the case of The State v. Barry Glenn Millwood with the Court of Appeals on March 5, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jeffrey Davis with the Court of Appeals on March 4, 2015. Counsel had an oral argument in the case of The State v. Demetrius Goodwin in this Court on February 18, 2015. Counsel filed the brief of appellant in the case of The State v. Jonathan Allen Finney with the Court of Appeals on February 13, 2015. Counsel had an oral argument in the case of The State v. Daniel Demond Griffin in the Court of Appeals 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 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,



LaNelle C. Durant
Appellate Defender

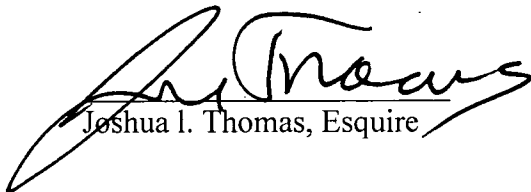
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 13th day of April, 2015.

I consent:



Joshua I. Thomas, Esquire