

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Greenville County

Robin B. Stilwell, Circuit Court Judge  
\_\_\_\_\_

 ORIGINAL

RECEIVED

APR 15 2015

S.C. Supreme Court

TRAVAUGHN THOMAS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001870  
\_\_\_\_\_

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

Counsel respectfully requests a **final extension of thirty (30) days until May 15, 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 is due to be served and filed with the Court today.
2. Counsel 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.

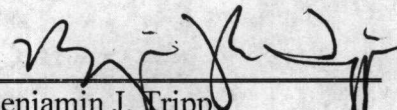
3. On April 13, 2015 counsel filed the initial brief of appellant and designation of matter in State v. Eddie Mack Stewart with the Court of Appeals. On April 7, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in John T. Robinson v. State with this Court. On March 31, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Curtis Schoclet v. State with this Court. On March 27, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Thomas A. Smart v. State with this Court. On March 23, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Jason Boney v. State with this Court. On March 20, 2015, counsel filed a petition for rehearing in State v. Jabarrie Brown with the Court of Appeals. On March 19, 2015, counsel filed a brief of appellant pursuant to *White v. State* in John G. Kimble v. State with this Court. On March 19, 2015, counsel filed a brief of appellant and designation of matter in State v. Michael D. Camp with the Court of Appeals. On March 11, 2015, counsel held an oral argument in State v. Michael C. Andes before the Court of Appeals. On March 9, 2015, counsel filed a brief of appellant and designation of matter in State v. Michael Hawkins with the Court of Appeals. On March 6, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Kenneth Henry Sherman v. State with this Court. On March 4, 2015, counsel held an oral argument in State v. Brittany Johnson before this Court. On March 2, 2015, Counsel filed a petition for writ of certiorari and accompanying appendix in John Forest Ham, Jr. v. State with this Court. On February 26, 2015, counsel filed a brief of petitioner in West Webb Mitchum v. State with the Court of Appeals.

4. Counsel makes this request in good faith and not for purpose 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.

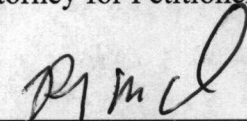
5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until May 15, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,

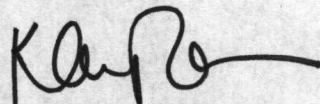
  
\_\_\_\_\_  
Benjamin J. Tripp  
Appellate Defender

Attorney for Petitioner

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 15th day of April, 2015

I Consent:

  
\_\_\_\_\_  
Karen Ratigan, Esquire