

STATE OF SOUTH CAROLINA

 ORIGINAL

IN THE SUPREME COURT

RECEIVED

Certiorari to Greenville County

APR 15 2015

Robin B. Stilwell, Circuit Court Judge

S.C. Supreme Court

TRAVIS MONTGOMERY BROWN, JR.,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001874

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.

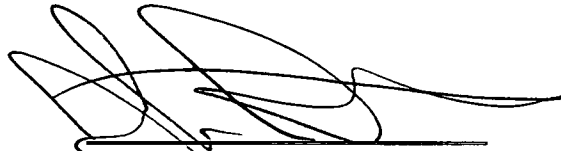
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roger Rutledge v. State of South Carolina in this Court on April 3, 2015. Counsel filed the reply to the return to the petition for writ of certiorari in the case of Phillip Fleming Watts v. State of South Carolina with this Court on April 3, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Arnold L. Ward v. State of South Carolina with this Court on April 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Upson with the Court of Appeals on March 23, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. O'Neal Bernard Byrdic, Jr. with the Court of Appeals on March 23, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Billy Joe Hannah v. State of South Carolina with this Court on March 19, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Shawn Lee Wyatt with the Court of Appeals on March 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Randy Yonson v. The State of South Carolina with this Court on February 27, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Scott Parker v. The State of South Carolina with this Court on February 20, 2015.

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.

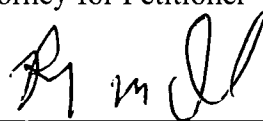
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until May 15, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



John H. Strom
Appellate Defender


Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 15th day of April, 2015

I Consent:


Karen Ratigan, Esquire