

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

Robin B. Stilwell, Circuit Court Judge

RECEIVED

APR 16 2015

S.C. Supreme Court

KEVIN LEE KEITH,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2014-001952

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

The undersigned counsel respectfully requests a **final thirty day extension, until May 18, 2015**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy Owens v. State with this Court on April 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of William C. Doar, III v. State with

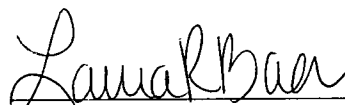
this Court on April 13, 2015. Counsel filed the return to petition for writ of certiorari in Osiel Narciso v. State with this Court on April 6, 2015. Counsel filed the petition for rehearing in the case of State v. Conrad Slocumb with the Court of Appeals on April 2, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ronald Mack v. State with this Court on April 1, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. John Smith with the Court of Appeals on March 27, 2015. Counsel filed the reply to initial brief of respondent in the case of State v. Mandy Smith 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. Bill Breland with the Court of Appeals on March 6, 2015.

3. As indicated by his consent below, counsel for the state does not oppose this request.

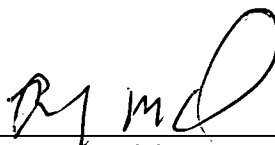
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until May 18, 2015**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



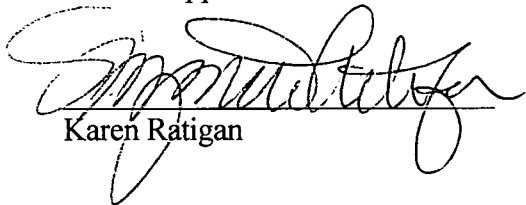
Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

April 16, 2015

I do not oppose:



Karen Ratigan