

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Richland County  
Robert E. Hood, Circuit Court Judge  
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APR 23 2015

S.C. Supreme Court

JOSHUA SANBORN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002347

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

The undersigned counsel respectfully requests a thirty day extension, <sup>uo</sup>until May 23, 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.

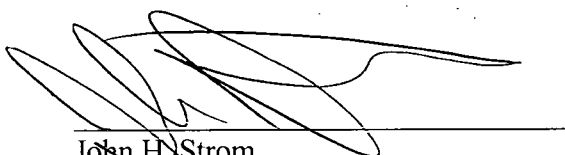
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Reginald Murray v. State of South Carolina in the Supreme Court on April 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Deleorn Thompson v. State of South Carolina in the Supreme Court on April 15, 2015. Counsel

filed the petition for writ of certiorari and accompanying appendix in the case of Roger Rutledge v. State of South Carolina in the Supreme 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 the Supreme 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 the Supreme Court on April 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Upsor 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 the Supreme Court on March 19, 2015.

3. 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 thirty day extension. 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,



John H. Strom  
Appellate Defender

April 23, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Richland County  
Robert E. Hood, Circuit Court Judge

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JOSHUA SANBORN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

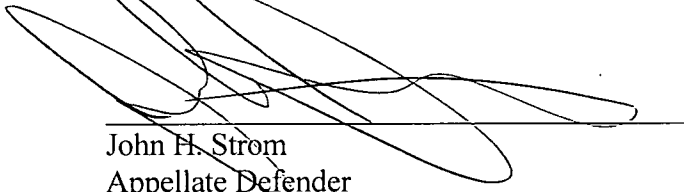
APPELLATE CASE NO. 2014-002347

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CERTIFICATE OF SERVICE

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The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Clay Mitchell, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 23rd day of April, 2015.




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John H. Strom  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 23rd day of April, 2015.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 3<sup>rd</sup>, 2023 .