

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Lexington County
William P. Keesley, Circuit Court Judge

**ORIGINAL
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MAY - 7 2015

S.C. Supreme Court

MICHAEL T. CANNON ,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000101

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

The undersigned counsel respectfully requests a thirty day extension, **until June 8, 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 Gary Grant v. State of South Carolina in the Supreme Court on May 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny White v. State of South Carolina in the Supreme Court on April 30, 2015. 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 Upson with the Court of Appeals on March 23, 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 Pl. Strom
Appellate Defender

May 7, 2015

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MICHAEL T. CANNON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000101

CERTIFICATE OF SERVICE

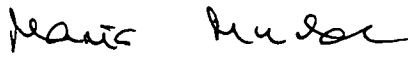
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon John Walt Whitmire, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 7th day of May, 2015.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 7th day of May, 2015.

 (L.S.)

Notary Public for South Carolina
My Commission Expires: July 3rd, 2023