

 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Charleston County

J.C. Buddy Nicholson, Jr., Circuit Court Judge

THE STATE,

APPELLANT,

V.

WHITLEE JONES,

RESPONDENT

APPELLATE CASE NO. 2014-002123

PETITION FOR EXTENSION TO FILE
INITIAL BRIEF OF RESPONDENT

The undersigned counsel respectfully requests a thirty day extension in which to file the initial brief of respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of respondent in this case is due to be served and filed today.
2. Counsel prepared for and participated in the Indigent Defense training (Public Defender 103) held April 27 – 29, 2015, in Beaufort, South Carolina. Counsel had an oral argument in the case of State v. Darren Scott before the Supreme Court on Wednesday, April 22, 2015. Counsel filed the petition for rehearing in the case of State v. Richard Bill Niles, Jr. with the Supreme Court on Thursday, April 9, 2015. Counsel had an oral argument in the case of State v. Manual Marin before the Supreme Court on Wednesday, April 8, 2015. Counsel has

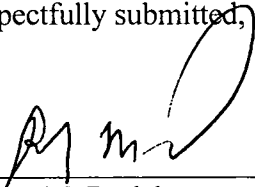
extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight. Counsel also has been training three new appellate defenders to include reading their briefs and certiorari petitions prior to their filing.

Counsel filed the return to petition for writ of certiorari in the case of Melvin Daniel v. State of South Carolina with the Supreme Court on Thursday, April 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Armando K. Chestnut with the Court of Appeals on April 2, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Albert Brandeberry with the Supreme Court on March 31, 2015. Counsel filed the United States certiorari petition in the case of Richard Moore v. State of South Carolina (3 issues) with the United States Supreme Court 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 initial brief of respondent be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

May 27, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Charleston County
J.C. Buddy Nicholson, Jr., Circuit Court Judge

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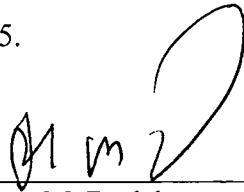
WHITLEE JONES,

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CERTIFICATE OF SERVICE

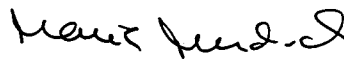
The undersigned attorney hereby certifies that a true copy of the petition for extension to file the initial brief of respondent in the above referenced case has been served upon Alphonso Simon, Jr., Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 27th day of May, 2015.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR RESPONDENT.

SUBSCRIBED AND SWORN TO before me
this 27th day of May, 2015.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: July 3, 2023