

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Darlington County
Thomas A. Russo, Circuit Court Judge

RECEIVED

JUN - 3 2015

S.C. Supreme Court

WARREN SMITH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002426

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for Warren Smith respectfully requests an extension of thirty (30) days 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 second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Warren Smith 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 her caseload, counsel hopes that no further extension requests will be required.

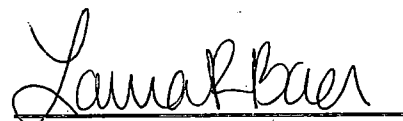
3. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Conrad Slocumb with this Court on June 1, 2015. Counsel had an oral argument in the case of State v. Ashley Moore with the Supreme Court on May 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin Keith v. State with this Court on May 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Didier Sellner v. State with this Court on May 12, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Evette Franklin v. State with this Court on May 6, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Darrell Birch with this Court on May 4, 2015. Counsel had an oral argument in the case of State v. Norman Hayes in the Court of Appeals on May 4, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Laura R. Baer
Appellate Defender

Attorney for Petitioner

June 3, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Darlington County
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WARREN SMITH,

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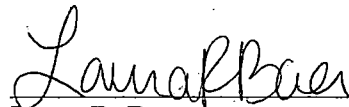
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002426

CERTIFICATE OF SERVICE

I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Joshua L. Thomas, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 3rd day of June, 2015.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 3rd day
of June, 2015.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: October 24, 2021.