

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County  
G. Thomas Cooper, Circuit Court Judge

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RECEIVED

JUN - 4 2015

ALONDA DESAUSSURE,

S.C. Supreme Court

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000137

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

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Counsel for Alonda Desaussure 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 on **Thursday, June 11, 2015**.

2. Counsel for Alonda Desaussure 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 the Supreme 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 the Supreme 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 the Supreme 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 the Supreme 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 the Supreme 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 until July 13, 2015**, 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 4, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County  
Stephanie P. McDonald., Circuit Court Judge

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ALONDA DESAUSSURE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000137

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CERTIFICATE OF SERVICE

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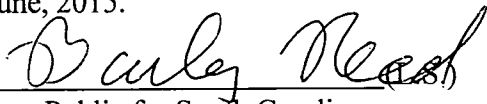
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon J. Rutledge Johnson, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 4th day of June, 2015.



Laura R. Baer  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 4th day  
of June, 2015.



Notary Public for South Carolina  
My Commission Expires: October 24, 2021.