

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Spartanburg County  
J. Derham Cole, Circuit Court Judge

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RECEIVED

JUN - 5 2015

S.C. Supreme Court

RODNEY ALEXANDER NASH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000070

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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 Rodney A. Nash 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 Rodney A. Nash 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.

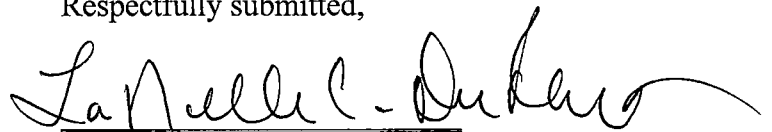
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Fred Jack Sanders with the Court of Appeals on June 4, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dominique M. Ross with the Court of Appeals on May 26, 2015. Counsel had an oral argument in the case of The State v. David Jakes in this Court on May 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Beneco Ganson with the Court of Appeals on May 12, 2015. Counsel had an oral argument in the case of The State v. Shawn Reaves in this Court on May 6, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenwood Bright v. State of South Carolina with this Court on April 29, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis Lamar Bowser v. State of South Carolina with this Court on April 24, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ferris G. Singley v. State of South Carolina with this Court on April 14, 2015. Counsel had an oral argument in the case of The State v. Steve Young in the Court of Appeals on April 13, 2015. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Christopher Taft in this Court on April 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Arthur Moseley with the Court of Appeals on April 1, 2015. Counsel filed the brief of appellant in the case of The State v. Benjamin Lavon Smalls with the Court of Appeals on March 25, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Yashawnus L. Patterson v. State of South Carolina with this Court on March 24, 2015. Counsel filed the brief of appellant in the case of The State v. Andre Green with the Court of Appeals on March 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jermaine T. McKelvey v. State of South Carolina with this Court on

March 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alvin S. Samuels v. State of South Carolina with this Court on March 9, 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,



LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner

June 5<sup>th</sup>, 2015

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RODNEY ALEXANDER NASH,

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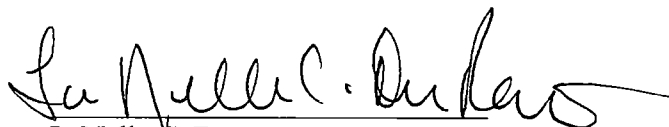
RESPONDENT

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CERTIFICATE OF SERVICE

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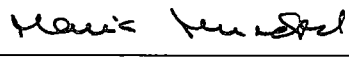
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Suzanne H. White, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 5<sup>th</sup> day of June, 2015.



LaNelle C. Durant  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 5<sup>th</sup> day  
of June, 2015.

 (L.S.)

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