

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Lexington County

L. Casey Manning, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

JUN 11 2015

S.C. Supreme Court

FRED R. RUTLAND,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-000381  
\_\_\_\_\_

**PETITION FOR EXTENSION TO FILE  
BRIEF OF PETITIONER**  
\_\_\_\_\_

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

1. The brief of petitioner in this case is due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Quoteas Nesbitt in the Court of Appeals on June 9, 2015. Counsel filed the petitioner's reply brief in the case of Richard

Moore v. State with the United States Supreme Court on June 8, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Kenneth Lynch with this Court on June 5, 2015. Counsel filed the petition for rehearing in the case of Michael Gonzales v. State in the Court of Appeals on May 28, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. William Travis Calvert in the Court of Appeals on May 27, 2015. Counsel filed the Anders Brief of Appellant and Designation of matter along with the Record on Appeal in the case of State v. Terry L. McCarrell in the Court of Appeals on May 21, 2015. Counsel the file petition for writ of certiorari to the Court of Appeals in the case of State v. Marvin Bowens Green with this Court on May 21, 2015. Counsel filed the petition for stay of execution in the case of Stephen Corey Bryant v. State in this Court on May 12, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kevin L. Howard in the Court of Appeals on May 12, 2015. Counsel filed the petition for rehearing in the case of State v. Walter Bash in the Court of Appeals on May 7, 2015. Counsel argued in the case of State v. Ahmad Jamal Wilkins in the Court of Appeals on May 6, 2015. Counsel argued in the case of Edward Andrell Whitner v. State in the Court of Appeals on May 4, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gary Clifton Hamilton in the Court of Appeals on April 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Carlos Luis Pinales Mejia v. State in this Court on April 27, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Darryl L. Drayton with this Court on April 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kenneth

Campbell in the Court of Appeals on April 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Enrico Diago v. State in this Court on April 14, 2015.

3. This request is made in good faith, and not for purposes of delay.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the brief of petitioner in this case. Counsel requests that the time limits for filing the brief of petitioner be held in abeyance pending a ruling on this motion.

Respectfully submitted,

Susan B. Hackett  
Susan B. Hackett  
Appellate Defender

June 11, 2015

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Lexington County

L. Casey Manning, Circuit Court Judge  
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FRED R. RUTLAND,

PETITIONER,

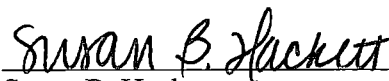
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

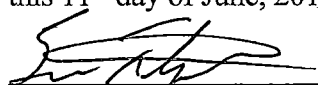
The undersigned attorney hereby certifies the petition in which to file the brief of petitioner in the above referenced case has been served upon John Walt Whitmire, Esquire, Assistant General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 11<sup>th</sup> day of June, 2015.



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Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 11<sup>th</sup> day of June, 2015.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 30, 2022.