

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

RECEIVED

JUN 11 2015

S.C. Supreme Court

JEREMIAH TURNER,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000127

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

Counsel for Jeremiah Turner 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:

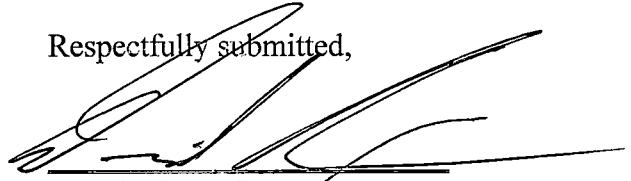
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Jeremiah Turner respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel had an oral argument in the case of State v. James Allen Johnson before the Court of Appeals on June 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew S. Medley with the Court of Appeals on June 8, 2015. Counsel filed the petition for rehearing in the case of State v. John E. Haynes with the Court of Appeals on May 20, 2015. Counsel filed the brief of appellant in the case of State v. Stewart Ard with the Court of Appeals on May 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Miama Kromah v. State of South Carolina with this Court on May 7, 2015. Counsel had an oral argument in the case of State v. Lamar Sequan Brown with the Court of Appeals on May 5, 2015. Counsel filed the brief of appellant in the case of State v. Leonard Eugene Brockington with the Court of Appeals on May 4, 2015. Counsel had an oral argument in the case of State v. Darren Scott before this Court on April 22, 2015, as co-counsel with Robert M. Dudek. Counsel filed the brief of appellant in the case of State v. Justin R. Simms with the Court of Appeals on April 21, 2015. Counsel had an oral argument in the case of State v. Erick Arroyo in the Court of Appeals on April 14, 2015. Counsel had an oral argument in the case of State v. Manuel Marin before this Court on April 8, 2015, as co-counsel with Robert M. Dudek. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher Terrell Gilyard with the Court of Appeals on March 26, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Kevin Bethel with the Court of Appeals on March 26, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Dominique Lavar Williams with the Court of Appeals 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,

A handwritten signature in black ink, appearing to read 'David Alexander', written over a horizontal line.

David Alexander
Appellate Defender

Attorney for Petitioner

June 11th, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

JEREMIAH TURNER,

PETITIONER,

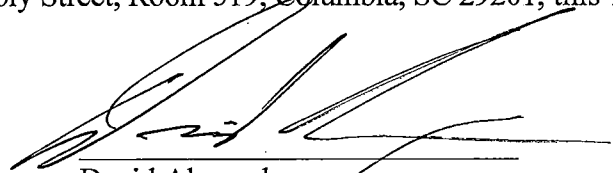
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

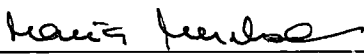
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon J. Rutledge Johnson, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 11th day of June, 2015.



David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 11th day
of June, 2015.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.