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JUN 12 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

S.C. Supreme Court

 ORIGINAL

Certiorari to Georgetown County

Kristi Lea Harrington, Circuit Court Judge

CRAIG GEATHERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002398

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI AND
ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final thirty day extension, until July 13 2015**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. **Counsel will attempt to file the petition before the due date if at all possible.** In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

3. Counsel filed the brief of appellant and designation of matter in the case of State v. Joshua Griffith with the Court of Appelas today. Counsel filed a Reply Brief in the case of Richard Bernard Moore v. State in the Supreme Court of the United States with co-counsel Susan

Hackett on June 8, 2015. Counsel filed a Return to Motion to Dismiss in the case of John William Dixon v. State before this Court on June 8, 2015. Counsel held an oral argument in State v. Charles M. Harris before this Court today. Counsel filed the petition for writ of certiorari to the Court of Appeals in Michael A. Hough v. State with this Court on June 1, 2015. Counsel filed the brief with a novel double jeopardy issue in the case of State v. Bryan Rearick with the Court of Appeals on May 29, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Maurice Roberts with the Court of Appeals on May 22, 2015. Counsel prepared for and was a trainer in the Indigent Defense training (Public Defender 103) held April 27-29, 2015, in Beaufort, South Carolina. Counsel filed the reply to return to petition for writ of certiorari in the case of Sammie Louis Stokes v. State with this Court on Wednesday, April 22, 2015. Counsel had an oral argument in the case of State v. Darren Scott before this Court on Wednesday, April 22, 2015. Counsel filed the petition for rehearing in the case of State v. Richard Bill Niles, Jr. with this Court on Thursday, April 9, 2015. Counsel had an oral argument in the case of State v. Manual Marin before this Court on Wednesday, April 8, 2015. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training three new appellate defenders and reading all of their writings.**

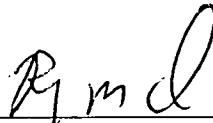
4. Counsel filed the return to petition for writ of certiorari in the case of Melvin Daniel v. State of South Carolina with this Court on Thursday, April 2, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Armando K. Chestnut with the Court of Appeals on April 2, 2015. Counsel filed the petition for writ of certiorari on the direct appeal in the case of State v. Albert Brandeberry with this Court on March 31, 2015. Counsel filed the United States certiorari petition in the case of Richard Moore v. State of South Carolina (3 issues) with the United States Supreme Court on March 23, 2015.

4. As indicated by his consent below, counsel for the state does not oppose this request.

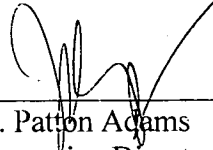
5. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until July 13, 2015**, in which to file the petition for writ of certiorari and accompanying appendix. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



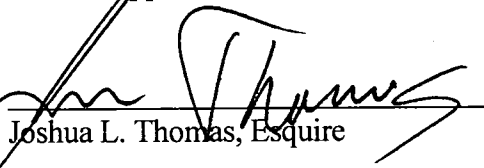
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director
J. Hugh Ryan, III
General Counsel

This 12th day of June, 2015

I do not oppose:



Joshua L. Thomas, Esquire