

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Aiken County

R. Knox McMahon, Circuit Court Judge

RECEIVED

JUN 18 2015

S.C. Supreme Court

JOSEPH J. MAGNI,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002362

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

Counsel respectfully requests a thirty day extension in which to file the petition for writ of certiorari 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 is due to be served and filed with the Court today.

2. Counsel 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. On June 17, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in David L. Parker v. State with this Court. On June 15, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Roy L. Jones with the Court of Appeals. On June 12, 2015, counsel filed a brief of appellant and record on appeal in State v. Johnny Lee Irby with the Court of Appeals. On June 3, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Laquavius T. Cleveland with the Court of Appeals. On June 1, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Michael Hough with this Court. On May 21, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Eric Marsh v. State with this Court. On May 19, 2015, counsel filed an initial brief of appellant and record on appeal in State v. Jonathan Brown with the Court of Appeals. On May 13, 2015, counsel filed an initial brief of appellant and designation of matter in State v. Roderick G. Wynn with the Court of Appeals. On May 6, 2015, counsel held an oral argument in State v. Stepheno Alston before the Court of Appeals. On May 6, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Elijah Baylock v. State with this Court. On May 1, 2015, counsel traveled to Aiken County for a hearing in State v. Barry Eugene Lafavor. On April 29, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Roshune Carelock v. State with this Court. On April 27, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Roger Raynard Parker v. State with this Court. On April 17, 2015, counsel filed a reply to return to petition for writ of certiorari in Luther Garner v. State with this Court. On April 15, 2015, counsel traveled to Beaufort County for the reconstruction hearing in

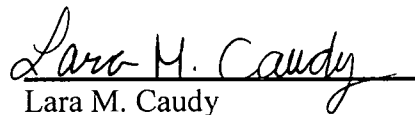
State v. Terrance Seabrook. On April 8, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Latisha Cochran v. State with this Court.

4. Counsel makes this request in good faith and not for purpose 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.

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 in this case based upon the above exigent circumstances.

Respectfully submitted,



Lara M. Caudy
Appellate Defender

Attorney for Petitioner

June 18, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Aiken County
R. Knox McMahon, Circuit Court Judge

JOSEPH J. MAGNI,

PETITIONER,

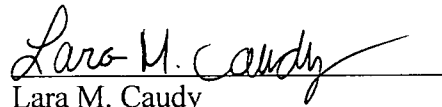
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

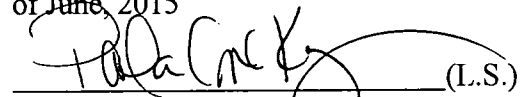
CERTIFICATE OF SERVICE

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 Daniel Gourley, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18th day of June, 2015.


Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18th day
of June, 2015


_____(I.S.)
Notary Public for South Carolina
My Commission Expires: July 24, 2022.