

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Orangeburg County

Diane Schafer Goodstein, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

JUN 22 2015

**S.C. Supreme Court**

REGINALD MONTGOMERY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2014-001288  
\_\_\_\_\_

PETITION FOR EXTENSION TO FILE  
THE BRIEF OF RESPONDENT  
\_\_\_\_\_

The undersigned counsel respectfully requests 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 extraordinary circumstances:

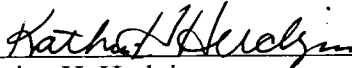
1. The brief of respondent in this case is due to be served and filed today.
2. Counsel filed the brief of petitioner in the case of State v. Julio Hunsberger with this Court on June 19, 2015. Counsel filed the petition for rehearing in the case of State v. Bryan Holder with the Court of Appeals on June 18, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Carmen Rice with this Court, on June 18, 2015. Counsel filed the reply to brief of petitioner pursuant to White v. State in the case of Clarence Cook v. State with this Court on June 3, 2015. Counsel

filed the initial brief of appellant and designation of matter in the case of State v. Timmy Wayne Laster with the Court of Appeals on June 3, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. James Scofield with this Court on June 1, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Ralpheal Robertson with the Court of Appeals on May 22, 2015. Counsel had an oral argument in the case of State v. Antwan McMillian in this Court on May 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Dennis Williams with the Court of Appeals on May 15, 2015.

3. 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 thirty day extension. Counsel respectfully requests that the time limits for filing the brief of petitioner be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
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Kathrine H. Hudgins  
Appellate Defender

June 22, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Orangeburg County  
Diane Schafer Goodstein, Circuit Court Judge

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REGINALD MONTGOMERY,

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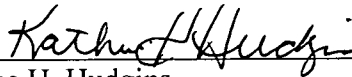
Appellate Case No. 2014-001288

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CERTIFICATE OF SERVICE

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The undersigned attorney hereby certifies that a true copy of the petition for extension to file the brief of petitioner in the above referenced case has been served upon J. Clayton Mitchell, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 22nd day of June, 2015.



Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 22nd day of June, 2015.

 (L.S.)  
Notary Public for South Carolina

My Commission Expires: October 24, 2021