

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Horry County
Kristi Lea Harrington, Circuit Court Judge

 ORIGINAL
RECEIVED

JUN 25 2015

S.C. Supreme Court

CRYSTAL TURNER,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000098

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

The undersigned counsel respectfully requests a thirty day extension, **until July 27, 2015**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

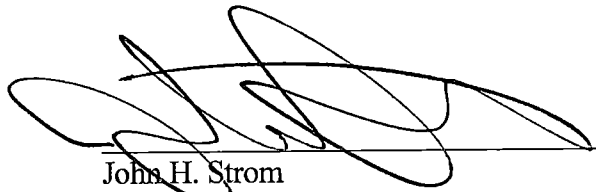
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the initial reply brief of appellant in the case of The State v. James Clyde Dill, Jr. with the Court of Appeals on June 18, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daniel Martinez Herrera with the Court of Appeals on June 1, 2015. Counsel filed the petition for writ of certiorari and

accompanying appendix in the case of Samuel Lamont Whitner v. State of South Carolina in the Supreme Court on May 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis M. Brown v. State of South Carolina in the Supreme Court on May 15, 2015. Counsel filed the initial reply brief of appellant in the case of The State v. O'Neal Bernard Byrdic, Jr. with the Court of Appeals on May 14, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kathryn King with the Court of Appeals on May 7, 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 petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John H. Strom", written over a horizontal line.

John H. Strom
Appellate Defender

June 25, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Horry County
Kristi Lea Harrington, Circuit Court Judge

CRYSTAL TURNER,

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V.

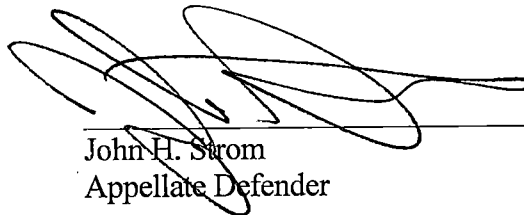
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000098

CERTIFICATE OF SERVICE

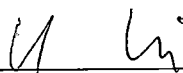
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Joshua L. Thomas, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 25th day of June, 2015.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 25th day of June, 2015.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12th, 2025.