

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
R. Keith Kelly, Circuit Court Judge

RECEIVED
JUN 26 2015
S.C. Supreme Court

JEREL WORTHY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000055

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

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

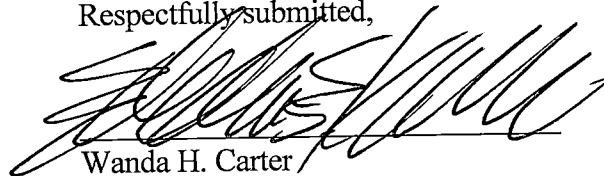
1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Reginald Antonio Nance v. State in this Court today June 26,

2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Antwon M. Baker, Jr. in this Court on June 22, 2015. Counsel argued in the case of State v. Kevin Jerome Gilliard in this Court on June 16, 2015. Counsel is filing the petition for writ of certiorari and accompanying appendix in the case of Cardelle Washington v. State in this Court on June 12, 2015. Counsel argued in the case of Ruben Ramirez v. State in the Court of Appeals on June 10, 2015. Counsel filed the Anders brief of appellant and designation of matter along with the Record on Appeal in the case of State v. Phillip Helms in the Court of Appeals on June 1, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Duston L. Rogers in this Court on May 20, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dervick L. Parker v. State in this Court on May 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Christopher J. Hicks in the Court of Appeals on May 12, 2015. Counsel filed the amended brief of petitioner in the case of Ruben Ramirez v. State in the Court of Appeals on May 4, 2015. Counsel filed the petition for rehearing in the case of State v. Antwon M. Baker, Jr. in the Court of Appeals on April 22, 2015.

3. This request is made in good faith, and not for purposes of delay.

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. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Wanda H. Carter', written over a horizontal line.

Wanda H. Carter
Appellate Defender

June 26, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
R. Keith Kelly, Circuit Court Judge

JEREL WORTHY,

PETITIONER,

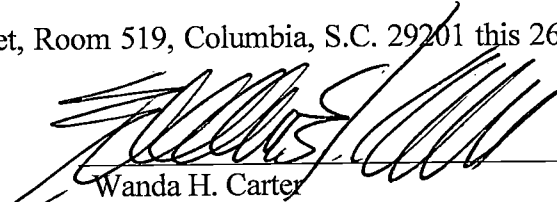
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

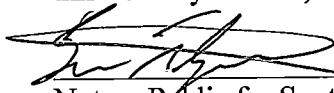
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Suzanne H. White, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 26th day of June, 2015.



Wanda H. Carter
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 26th day of June, 2015.



(L.S.)
Notary Public for South Carolina
My Commission Expires: ~~October 30, 2022.~~