

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

 ORIGINAL

Certiorari to Charleston County

J. C. Buddy Nicholson, Jr., Circuit Court Judge

RECEIVED

JUL -1 2015

S.C. Supreme Court

THE STATE,

APPELLANT,

V.

WHITLEE JONES,

RESPONDENT

APPELLATE CASE NO. 2014-002123

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE RESPONDENT BRIEF

Counsel for Whitlee Jones respectfully requests a **final** extension of thirty (30) days, **until July 29, 2015**, in which to file the initial brief of Respondent and designation of matter on appeal in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The initial brief of respondent and designation of matter on appeal is due to be filed with the Court today.

2. Counsel for Whitlee Jones respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time.

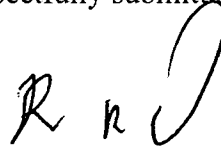
3. Counsel filed the brief of appellant and designation of matter in the case of State v. Terry Hall with Court of Appeals on June 26, 2015. Counsel filed a petition for rehearing in the case of State v. Curtis J. Simms in this Court with co-counsel Susan Barber Hackett and co-counsel David Alexander on June 24, 2015. Counsel filed a redacted brief of appellant and designation of matter in the death penalty case of State v. Ricky Lee Blackwell in this Court with co-counsel David Alexander on June 18, 2015. Counsel filed a brief of petitioner in the case of State v. Antonio Miller with this Court on June 18, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. William Pou with this Court on June 15, 2015. Counsel filed the Return to the Motion to Dismiss as Interlocutory in the case of State v. Bryan Rearick with Court of Appeals on June 15, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Joshua Griffith with Court of Appeals on June 12, 2015. Counsel filed a Reply Brief in the case of Richard Bernard Moore v. State in the Supreme Court of the United States today 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 argued the case of State v. Charles M. Harris before this Court on June 3, 2015. 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, with co-counsel Lara Caudy. Counsel filed the brief with a novel double jeopardy issue in the case of State v. Bryan Rearick with Court of Appeals on May 29, 2015. Counsel filed motion to certify case for review by this Court in the case of State v. Bryan Rearick with this Court 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.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel is working first on cases that have been extended three times in an effort to make his caseload more manageable and reduce the number of extensions in the future.

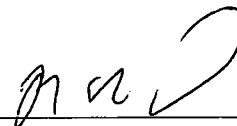
5. Counsel for the Attorney General's office consents to this request shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final** thirty day extension, **until July 29, 2015**, in which to file the initial brief of respondent and designation of matter on appeal in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



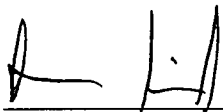
Robert M. Dudek
Chief Appellate Defender



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

This 30th day of June, 2015.

I consent:



Alphonso Simon, Jr., Esquire