

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Spartanburg County

J. Derham Cole, Circuit Court Judge

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RECEIVED

JUL - 8 2015

S.C. Supreme Court

RODNEY ALEXANDER NASH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000070

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

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Counsel for Rodney Nash respectfully requests a **final thirty (30) day extension, until August 7, 2015**, in which to file the petition for writ of certiorari and appendix 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 petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Mr. Nash 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. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. James Eddie Bailey with the Court of Appeals on June 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Elvis Bostic v. State of South Carolina with this Court on June 25, 2015. Counsel filed the petition for rehearing in the case of The State v. Christopher Ryan Whitehead with this Court on June 23, 2015. Counsel filed the petition for rehearing in the case of The State v. David Eugene Rosier, Jr. with the Court of Appeals on June 11, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Odouri L. Lytes v. State of South Carolina with this Court on June 10, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Fred Jack Sanders with the Court of Appeals on June 4, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dominique M. Ross with the Court of Appeals on May 26, 2015. Counsel had an oral argument in the case of The State v. David Jakes in this Court on May 20, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Beneco Ganson with the Court of Appeals on May 12, 2015.

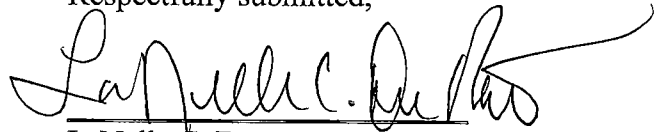
4. Counsel makes this request in good faith and not for purpose of delay.

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

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until August 7, 2015**, in which to file the petition for writ of certiorari and

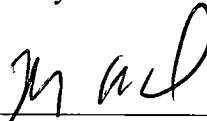
appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant  
Appellate Defender

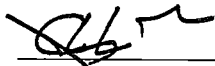
Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 8<sup>th</sup> day of July, 2015.

I consent:



Suzanne H. White, Esquire