



STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Charleston County
Thomas G. Cooper, Circuit Court Judge

JEREMIAH TURNER,



JUL 13 2015
S.C. Supreme Court
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2015-000127

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

Counsel for Jeremiah Turner respectfully requests a **final thirty (30) day extension, until August 12, 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. Turner 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed a petition for writ of certiorari in the case of The State v. Anthony Jackson with the United States Supreme Court on July, 7, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Jeffrey Allen Chapman with the Court of Appeals on July 1, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Blaton Wakeem Smith with the Court of Appeals on June 29, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Akeem O. Smith with this Court on June 22, 2015. Counsel filed the brief of appellant in the case of State v. Tyress Antonio Littlejohn with the Court of Appeals on June 12, 2015. Counsel had an oral argument in the case of State v. James Allen Johnson before the Court of Appeals on June 9, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew S. Medley with the Court of Appeals on June 8, 2015. Counsel filed the petition for rehearing in the case of State v. John E. Haynes with the Court of Appeals on May 20, 2015. Counsel filed the brief of appellant in the case of State v. Stewart Ard with the Court of Appeals on May 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Miama Kromah v. State of South Carolina with this Court on May 7, 2015. Counsel had an oral argument in the case of State v. Lamar Sequan Brown with the Court of Appeals on May 5, 2015. Counsel filed the brief of appellant in the case of State v. Leonard Eugene Brockington with the Court of Appeals on May 4, 2015. Counsel had an oral argument in the case of State v. Darren Scott before this Court on April 22, 2015, as co-counsel with Robert M. Dudek. Counsel filed the brief of appellant in the case of State v. Justin R. Simms with the Court of Appeals on April 21, 2015. Counsel had an oral argument in the case of State v. Erick Arroyo in the Court of Appeals on April 14, 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.

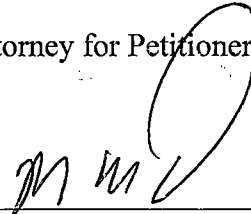
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until August 12, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander
Appellate Defender

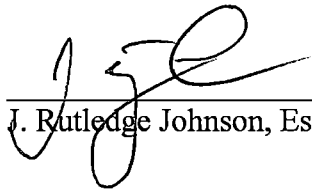
Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 13th day of July, 2015.

I consent:



J. Rutledge Johnson, Esquire