

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to York County
Alison Renee Lee, Circuit Court Judge

RECEIVED

JUL 15 2015

S.C. Supreme Court

BRIAN GAINES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000103

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

The undersigned counsel respectfully requests a thirty day extension 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.

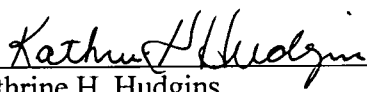
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Preston Oates with the Court of Appeals on July 13, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Terrell Chandler v. State with this Court on July 6, 2015. Counsel filed the initial brief of appellant in the case of State v. James Wright with the Court of Appeals on July 2, 2015. Counsel filed the petition for writ of

certiorari and accompanying appendix in the case of Adrian Beaton v. State with this Court on June 25, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. David Bowers with the Court of Appeals on June 22, 2015. Counsel filed the brief of petitioner in the case of State v. Julio Hunsberger with this Court on June 19, 2015. Counsel filed the petition for rehearing in the case of State v. Bryan Holder with the Court of Appeals on June 18, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Carmen Rice with this Court on June 18, 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,



Kathrine H. Hudgins
Appellate Defender

July 15, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to York County
Alison Renee Lee., Circuit Court Judge

BRIAN GAINES,

PETITIONER,

V.

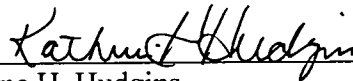
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001288

CERTIFICATE OF SERVICE

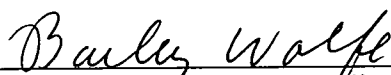
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon J. Rutldge Johnson, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 15th day of July, 2015.



Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 15th day of July, 2015.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: October 24, 2021 .