

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Aiken County

R. Knox McMahon, Circuit Court Judge

ORIGINAL

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JUL 20 2015

S.C. Supreme Court
PETITIONER,

JOSEPH J. MAGNI,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002362

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

Counsel respectfully requests a **final extension of thirty (30) days until August 19, 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 is due to be served and filed with the Court today.
2. Counsel 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. Today, counsel will file the initial brief of appellant and designation of matter In the matter of the care and treatment of Dewey Chadwick with the Court of Appeals. On July 14, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Philenza Pritchett with the Court of Appeals. On July 6, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Frank Terrance Singleton, III with the Court of Appeals. On June 17, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in David L. Parker v. State with this Court. On June 15, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Roy L. Jones with the Court of Appeals. On June 12, 2015, counsel filed a brief of appellant and record on appeal in State v. Johnny Lee Irby with the Court of Appeals. On June 3, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Laquavius T. Cleveland with the Court of Appeals. On June 1, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Michael Hough with this Court. On May 21, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Eric Marsh v. State with this Court. On May 19, 2015, counsel filed an initial brief of appellant and record on appeal in State v. Jonathan Brown with the Court of Appeals. On May 13, 2015, counsel filed an initial brief of appellant and designation of matter in State v. Roderick G. Wynn with the Court of Appeals. On May 6, 2015, counsel held an oral argument in State v. Stepheno Alston before the Court of Appeals. On May 6, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Elijah Baylock v. State with this Court.

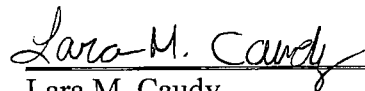
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

will hopefully become more manageable in the near future, and less extensions will need to be requested.

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

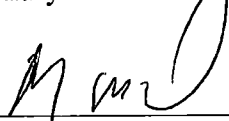
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until August 19, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



Lara M. Caudy
Appellate Defender


Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 20th day of July, 2015

I Consent:



Daniel Gourley