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JUL 22 2015

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

S.C. Supreme Court

Certiorari to Orangeburg County

 ORIGINAL

Diane Schafer Goodstein, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

REGINALD MONTGOMERY,

PETITIONER

Appellate Case No. 2014-001288

**PETITION FOR EXTENSION TO FILE
BRIEF OF PETITIONER**

The undersigned counsel would respectfully request a **final thirty-day extension, until August 21, 2015**, in which to file the brief of petitioner in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The brief of petitioner in this case is due to be served and filed today.
2. Counsel filed the initial brief of appellant in the case of State v. Manuel Pacheco with the Court of Appeals on July 20, 2015. 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.

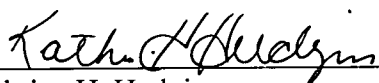
Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian Beaton v. State with this Court on June 25, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. David Bowers with the Court of Appeals on June 22, 2015. Counsel 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.

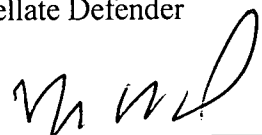
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request **final thirty-day extension, until August 21, 2015**, in which to file the brief of petitioner in this case. Counsel requests that the time limits for filing the brief of petitioner be held in abeyance pending a ruling on this motion.

Respectfully submitted,



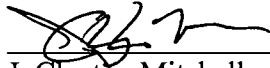
Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

July 22, 2015

I DO NOT OPPOSE:



J. Clayton Mitchell