

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Horry County
Kristi Lea Harrington, Circuit Court Judge

 ORIGINAL
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JUL 27 2015

CRYSTAL TURNER,

S.C. Supreme Court

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000098

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 26, 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 his caseload, counsel hopes that no further extension requests will be required.

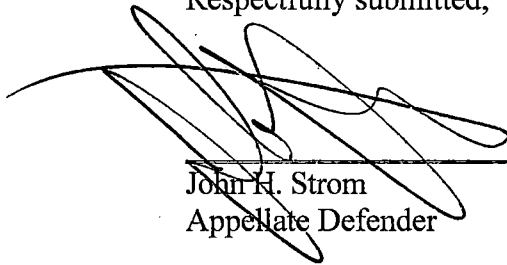
3. Counsel filed the Motion to Hold Appeal in Abeyance and to Remand for a New Evidentiary Hearing Based on After-Discovered Evidence and accompanying appendix in the case of Tunzy Sanders v. State of South Carolina in the Supreme Court on July 24, 2015. Counsel filed the initial reply brief of appellant in the case of The State v. Alexander Carmichael Huckabee III with the Court of Appeals on July 9, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael T. Cannon v. State of South Carolina in the Supreme Court on July 8, 2015. Counsel filed the initial brief of appellant in the case of The State v. Jamel Watt with the Court of Appeals on July 8, 2015. Counsel filed the initial reply brief of appellant in the case of The State v. James Clyde Dill, Jr. with the Court of Appeals on June 18, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daniel Martinez Herrera with the Court of Appeals on June 1, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Samuel Lamont Whitner v. State of South Carolina in the Supreme Court on May 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Travis M. Brown v. State of South Carolina in the Supreme Court on May 15, 2015. Counsel filed the initial reply brief of appellant in the case of The State v. O'Neal Bernard Byrdic, Jr. with the Court of Appeals on May 14, 2015.

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.

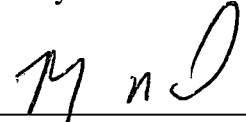
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until August 26, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



John H. Strom
Appellate Defender


Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 27th day of July, 2015

I Consent:



pc Joshua L. Thomas, Esquire