

 ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Spartanburg County  
R. Keith Kelly, Circuit Court Judge

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RECEIVED

AUG - 6 2015

S.C. Supreme Court

JEROD KEYKENDALL HARRIS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002693

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

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The undersigned counsel respectfully requests a thirty day extension, **until September 7, 2015**, 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 in the case of The State v. Joseph Williams Dinkins with the Court of Appeals on August 5, 2015. Counsel filed the initial reply brief of appellant in the case of The State v. John Upson with the Court of Appeals on July 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of

Richard A. Green v. State of South Carolina in the Supreme Court on July 27, 2015. 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.

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,



John H. Strom  
Appellate Defender

August 6, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Spartanburg County  
R. Keith Kelly, Circuit Court Judge

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JEROD KEYKENDALL HARRIS,

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STATE OF SOUTH CAROLINA,

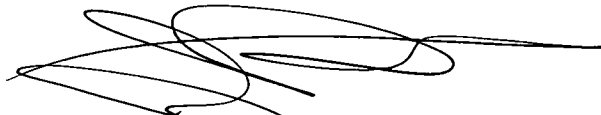
RESPONDENT

APPELLATE CASE NO. 2014-002693

CERTIFICATE OF SERVICE

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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 Suzanne H. White Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 6<sup>th</sup> day of August, 2015.

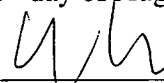


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John H. Strom  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 6<sup>th</sup> day of August, 2015.

  
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(L.S.)  
Notary Public for South Carolina  
My Commission Expires: May 12<sup>th</sup>, 2025.