

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Berkeley County  
G. Thomas Cooper, Circuit Court Judge

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 ORIGINAL

RECEIVED

AUG - 7 2015

VERNON MICHAEL WILCOX,

S.C. Supreme Court

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000411

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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 **final 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. **Counsel will attempt to file the petition before the due date if at all possible.** 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 return to petition for writ of certiorari to the Court of Appeals in the case of State v. Raheem D. King with this Court, on August 6, 2015. Counsel filed the brief of respondent and designation of matter in the case of State v. Whitlee Jones with this Court on July 29, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case

of State v. Raheem D. King in this Court, on July 27, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. Gary R. Dargan with the Court of Appeals on July 24, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Robert Lee Moore with the Court of Appeals on July 17, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Tawanda Allen with this Court on July 16, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. Rashondre Montese Boozer with the Court of Appeals on July 15, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Craig Geathers v. State with this Court on July 10, 2015. Counsel filed the brief of appellant and record on appeal in the case of State v. Jennifer Lorene Hatfield Griffin with the Court of Appeals on July 8, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Terry Hall with Court of Appeals on June 26, 2015. Counsel filed a petition for rehearing in the case of State v. Curtis J. Simms in this Court with co-counsel Susan Barber Hackett and co-counsel David Alexander on June 24, 2015. Counsel filed a redacted brief of appellant and designation of matter in the death penalty case of State v. Ricky Lee Blackwell in this Court with co-counsel David Alexander on June 18, 2015. Counsel filed a brief of petitioner in the case of State v. Antonio Miller with this Court on June 18, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. William Pou with this Court on June 15, 2015. Counsel filed the Return to the Motion to Dismiss as Interlocutory in the case of State v. Bryan Rearick with Court of Appeals on June 15, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Joshua Griffith with Court of Appeals on June 12, 2015. Counsel filed a Reply Brief in the case of Richard Bernard Moore v. State in the Supreme Court of the United States with co-counsel Susan Hackett on June 8, 2015. Counsel filed a Return to Motion to Dismiss in the case of John William Dixon v. State before this Court on June 8, 2015. Counsel argued the case of State v. Charles M. Harris before this Court on June 3, 2015. Counsel filed the petition for writ of certiorari to the

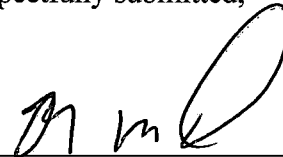
Court of Appeals in Michael A. Hough v. State with this Court on June 1, 2015, with co-counsel Lara Caudy. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, as stated above, training three new appellate defenders and reading all of their writings.**

3. As indicated by his consent below, counsel for the state does not oppose this request.

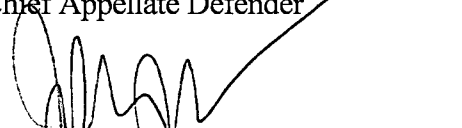
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until September 7, 2015**, in which to file the petition for writ of certiorari and accompanying appendix. 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,



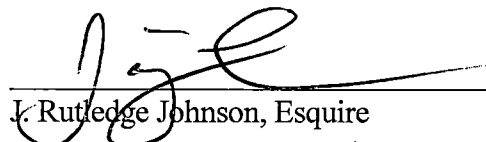
Robert M. Dudek  
Chief Appellate Defender



T. Patton Adams  
Executive Director  
J. Hugh Ryan, III  
General Counsel

This 7<sup>th</sup> day of August, 2015

I do not oppose:



J. Rutledge Johnson, Esquire