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AUG 27 2015

S.C. Supreme Court

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Anderson County
Carmen T. Mullen, Circuit Court Judge

NATHANIEL C. DICKSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2015-000439

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

Counsel for Nathaniel Dickson respectfully requests a **final thirty (30) day extension, until September 25, 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 are due to be filed with the Court today. The Court has granted counsel two previous extensions.

2. Counsel for Nathaniel Dickson 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. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Corey William Brown with the Court of Appeals on August 26, 2015. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Willie James Poole v. State of South Carolina with the Supreme Court on August 17, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Michael Antonio Williams with the Court of Appeals on August 11, 2015. Counsel filed the petition for rehearing in the case of The State v. Christopher Broadnax with the Supreme Court on August 6, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Wendall Wilkins with the Court of Appeals on August 5, 2015. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Rodney Alexander Nash v. State of South Carolina with the Supreme Court on July 28, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Billy Alford with the Court of Appeals on July 23, 2015. Counsel filed the petition for rehearing in the case of The State v. Steve Young with the Court of Appeals on July 23, 2015. Counsel filed the petition for rehearing in the case of The State v. Shawn J. Burris with the Court of Appeals on July 16, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Charles Tramayne Myers with the Court of Appeals on July 13, 2015. Counsel filed the petition for rehearing in the case of The State v. Daniel Demond Griffin with the Court of Appeals on July 8, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lynn Larry Hunt v. State in the Supreme Court on July 8, 2015. Counsel

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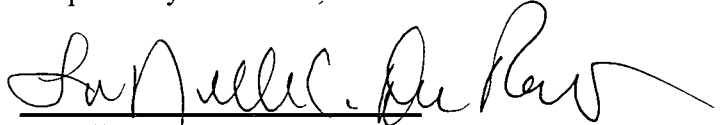
filed the initial brief of appellant and designation of matter in the case of The State v. James Eddie Bailey with the Court of Appeals on June 30, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.

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

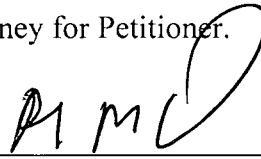
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until September 25, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 27th day of August, 2015.

I consent:



John Walt Whitmire, Esquire