

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Pickens County

James R. Barber, III, Circuit Court Judge

RECEIVED

AUG 31 2015

S.C. Supreme Court

MARSHALL H. COLLINS,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

APPELLATE CASE NO. 2014-002397

PETITION FOR EXTENSION TO FILE THE
RETURN TO THE PETITION FOR WRIT OF CERTIORARI

The undersigned counsel respectfully requests a thirty day extension in which to file the return to the petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The return to the petition for writ of certiorari in this case is due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Sandy Lynn Westmoreland with the Court of Appeals today. Counsel presented on warrantless searches at the 2015 Magistrate Advisory Council Intensive Training Seminar on August 18 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Calvert Myers with the Court of Appeals on August 14, 2015. Counsel filed the reply brief in

the case of State v. Christina Reece with the Court of Appeals on August 13, 2015. 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 with 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 with 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 with 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 has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training three new appellate defenders and reading all of their writings.**

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 return to the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender



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

August 31, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Pickens County

James R. Barber, III, Circuit Court Judge

MARSHALL H. COLLINS,

RESPONDENT,

V.

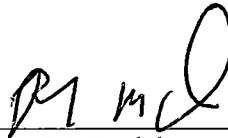
STATE OF SOUTH CAROLINA,

PETITIONER

APPELLATE CASE NO. 2014-002397

CERTIFICATE OF SERVICE

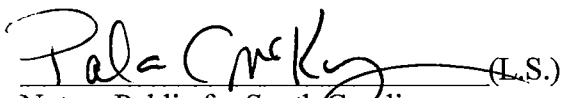
The undersigned attorney hereby certifies that a true copy of the petition for extension to file the return to the petition for writ of certiorari in the above referenced case has been served upon Karen Ratigan, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 31st day of August, 2015.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR RESPONDENT.

SUBSCRIBED AND SWORN TO before me
this 31st day of August, 2015.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: July 24, 2022 .