

STATE OF SOUTH CAROLINA

ORIGINAL

IN THE SUPREME COURT

RECEIVED

Certiorari to Greenville County
Letitia H. Verdin, Circuit Court Judge

SEP 04 2015

S.C. Supreme Court

JOSEPH PAUGH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000072

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 October 5th, 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.

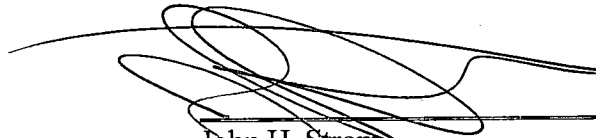
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Crystal Turner v. State of South Carolina in the Supreme Court on August 27, 2015. Counsel filed the return to the petition for rehearing and suggestion for rehearing en banc in the case of The State v. Norman J. Hayes with the Court of Appeals on August 24, 2015. Counsel filed the Reply to the State's Return and Amended 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 August 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Anthony Sapp v. State of South Carolina in the Supreme Court on August 7, 2015. 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.

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.

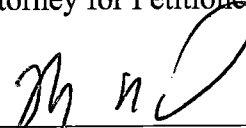
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until October 5th, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



John H. Strom
Appellate Defender

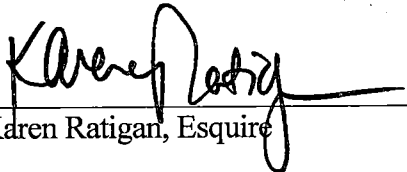
Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 4th day of September, 2015.

I Consent:


Karen Ratigan, Esquire