

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Spartanburg County  
Roger L. Couch, Circuit Court Judge

RECEIVED

SEP 14 2015

S.C. Supreme Court

ADDIE THILAVANH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000993

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

The undersigned counsel respectfully requests a thirty day extension, **until October 14, 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 and designation of matter in the case of The State v. John Henry Lowery with the Court of Appeals on September 11, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Allen Moore v. State of South Carolina in the Supreme Court on September 9, 2015. Counsel filed the

initial brief of appellant and designation of matter in the case of The State v. Demario Thompson with the Court of Appeals on September 9, 2015. Counsel filed the brief of petitioner and accompanying appendix in the case of Jarvis Gibbs v. State of South Carolina in the Supreme Court on September 4, 2015. 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.

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,

A handwritten signature in black ink, appearing to read "John H. Strom", written over a horizontal line.

John H. Strom  
Appellate Defender

September 14, 2015

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Spartanburg County  
Roger L. Couch, Circuit Court Judge  
\_\_\_\_\_

ADDIE THILAVANH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000993

CERTIFICATE OF SERVICE  
\_\_\_\_\_

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 Alicia Olive, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 14<sup>th</sup> day of September, 2015.



John H. Strom  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 14<sup>th</sup> day of September, 2015.

u ti (L.S.)

Notary Public for South Carolina

My Commission Expires: May 12<sup>th</sup>, 2025.