

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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 ORIGINAL

Certiorari to Spartanburg County  
Deadra L. Jefferson, Circuit Court Judge

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**RECEIVED**

SEP 17 2015

TONY MEDFORD,

**S.C. Supreme Court**  
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000818

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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 October 19, 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 petition for writ of certiorari and accompanying appendix in the case of Brian Gaines v. State with this Court on September 14, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Lester Mosley with the Court of Appeals on September 11, 2015. Counsel filed the initial brief of appellant and designation of

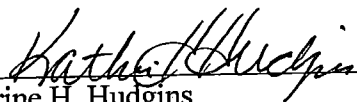
matter in the case of State v. Julius Manigault with the Court of Appeals on September 10, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. David Chiles Jr. with the Court of Appeals on August 26, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Garris v. State with this Court on August 26, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Keion Griffin v. State with this Court on August 26, 2015. Counsel filed the brief of petitioner in the case of Reginald Montgomery v. State with this Court on August 19, 2015.

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 October 19, 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,

  
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Kathrine H. Hudgins  
Appellate Defender

*nmj*

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Robert M. Dudek  
Chief Appellate Defender

September 17, 2015

I do not oppose:

*Karen Ratigan*  

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*Karen Ratigan*  
*Alicia Olive*