

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Orangeburg County

Edgar W. Dickson, Circuit Court Judge

ORIGINAL
RECEIVED
SEP 21 2015
S.C. Supreme Court

EZEKIEL HAYNES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000147

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

The undersigned counsel respectfully requests a thirty day extension, **until October 21, 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:

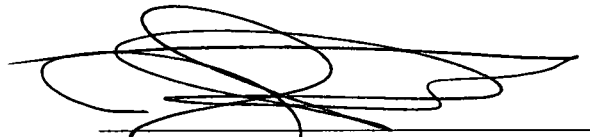
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Henry Lowery with the Court of Appeals on September 11, 2015. Counsel filed the 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.

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,



John H. Strom
Appellate Defender

September 21, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Orangeburg County
Edgar W. Dickson, Circuit Court Judge

EZEKIEL HAYNES,

PETITIONER,

V.


STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000147

CERTIFICATE OF SERVICE

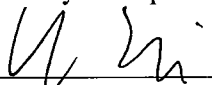
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Clay Mitchell, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 21st day of September, 2015.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 21st day of September, 2015.

 _____ (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12th, 2025.