

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

 ORIGINAL

Certiorari to Pickens County

James R. Barber, III, Circuit Court Judge

RECEIVED

SEP 30 2015

MARSHALL H. COLLINS,

S.C. Supreme Court

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 **final thirty day extension, until October 30, 2015**, 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 exigent circumstances:

1. The return to the petition for writ of certiorari in this case is due to be served and filed today.
2. Counsel attended the Board meeting of the South Carolina Commission on Indigent Defense on September 25, 2015. Counsel prepared for and **presented his Case Law Update presentation for the 2015 Annual Public Defender Conference held September 21-23, 2015**, in Myrtle Beach, South Carolina. Counsel filed the brief of appellant and record on appeal in the

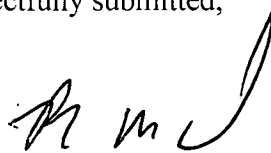
case of State v. Tre'Vaughn Jackson with the Court of Appeals on September 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Vernon Michael Wilcox v. State with this Court on September 8, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Sandy Lynn Westmoreland with the Court of Appeals on August 31, 2015. 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 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. As indicated by her 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 30, 2015**, in which to file the return to the petition for writ of certiorari. 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,



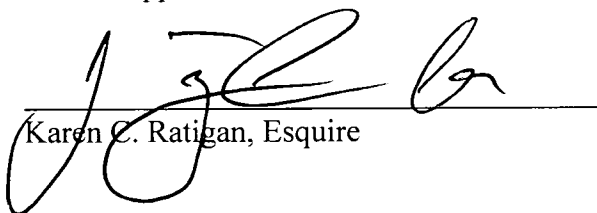
Robert M. Dudek
Chief Appellate Defender



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

September 30, 2015

I do not oppose:



Karen C. Ratigan, Esquire