

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Florence County

D. Craig Brown, Circuit Court Judge

RECEIVED

OCT 12 2015

S.C. Supreme Court

RODNEY D. IVEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO: 2015-001314

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

The undersigned counsel respectfully requests a thirty day extension, **until November 9, 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.

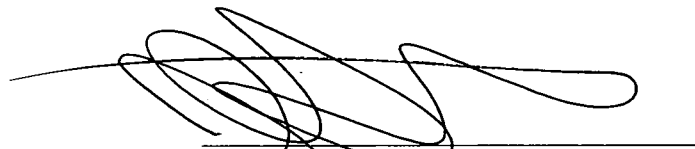
2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jo Pradubsri with the Court of Appeals on October 8, 2015. Counsel filed the

petition for writ of certiorari and accompanying appendix in the case of Jarrold Keykendall Harris v. State of South Carolina in the Supreme Court on October 8, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joseph Paugh v. State of South Carolina in the Supreme Court on October 7, 2015. 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.

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

October 12, 2015

*Please note: This petition was due Thursday, October 8, during which the SCCID was closed due to a weather emergency.

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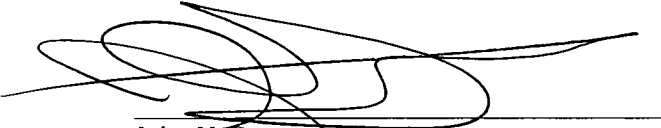
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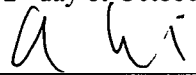
CERTIFICATE OF SERVICE

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 Croom Hunter, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 12th day of October, 2015.


John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 12th day of October, 2015.


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