

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Spartanburg County

R. Keith Kelly, Circuit Court Judge

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OCT 13 2015

S.C. Supreme Court

PETITIONER,

JEROD KEYKENDALL HARRIS,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-002693


**CONSENT MOTION TO FILE THE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX OUT OF TIME**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, counsel for Jerod K. Harris respectfully requests the relaxation of Rule 263(b), SCACR, and allow leave in which to file the petition for writ of certiorari and accompanying appendix in this case. In support of this petition he shows:

1. The petition for writ of certiorari in this case was due to be filed on October 8, 2015.
2. Due to historic flooding in the Columbia, South Carolina area, counsel's offices and this Court were closed from October 5th through October 6th and again on October 8th through October 9th. Accordingly, counsel was unable to timely file the petition for writ of certiorari.

3. Counsel has prepared and is filing the petition for writ of certiorari and accompanying appendix simultaneously with this motion.
4. Counsel for the Attorney General's office graciously consents to this request as shown by signature below.
3. Counsel makes this request in good faith and not for purpose of delay.

WHEREFORE, the undersigned counsel respectfully requests that the Court grant counsel's request to relax Rule 263(b), SCACR, and allow leave in which to file the petition for writ of certiorari and accompanying appendix in this case out of time based upon the above exigent circumstances.




John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER

October 13, 2015

I Consent:



Alicia Olive, Esquire
Assistant Attorney General