

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Spartanburg County  
Roger L. Couch, Circuit Court Judge

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RECEIVED

OCT 19 2015

SUPREME RAHAAM ACKBAR,

S.C. Supreme Court  
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001052

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX

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Counsel for Supreme Rahaam Ackbar respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Supreme Rahaam Ackbar respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

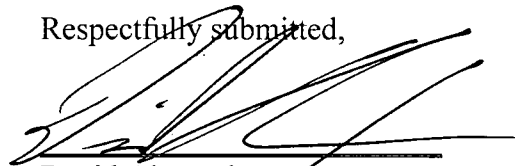
3. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. Sheldon Lamar Kelly with this Court on October 14, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Chad Junior Bussell with the Court of Appeals on October 13, 2015. Counsel had an oral argument before this Court on October 6, 2015 in the case of The State v. Kevin T. Bennett. Due to weather conditions experienced in Columbia, State offices were closed on October 5, 6, 8, and 9, 2015. On September 30, 2015, Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenneth D. Smith v. State of South Carolina with this Court. On September 28, 2015 counsel filed the initial brief of appellant and designation of matter in the case of The State v. Lorenzo Bernard Young with the Court of Appeals. On September 10, 2015 counsel had an oral argument before the Court of Appeals in the case of The State v. William Bolt. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Rishawn Reeder v. The State with this Court on September 8, 2015. Counsel filed a return to petition for writ of certiorari to the Court of Appeals in the case of Charles Ray Dean v. State of South Carolina with this Court on September 8, 2015. On August 31, 2015, counsel had two hearings in the Circuit Court: a hearing in Orangeburg County before the Honorable Deadra L. Jefferson in State v. Tykeem May; and a hearing in Chesterfield County held before the Honorable Larry B. Hyman, Jr. in Noah Mumford v. State. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Jeffrey Riebe v. The State, with this Court on August 27, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tyrone D. Ellison with the Court of Appeals on August 25, 2015. Counsel filed a return to petition for writ of certiorari in the case of The State v. Erick Arroyo with this Court on August 14, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander  
Appellate Defender

Attorney for Petitioner



Robert M. Dudek  
Chief Appellate Defender

October 19, 2015

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SUPREME RAHAAM ACKBAR,

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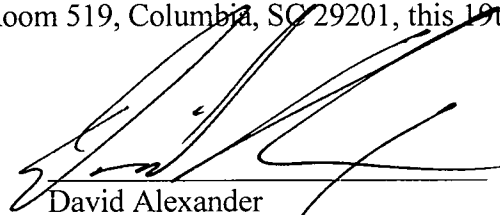
RESPONDENT

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CERTIFICATE OF SERVICE

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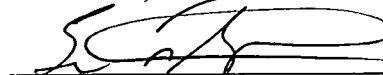
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Alicia Olive, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 19th day of October, 2015.



David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 19th day  
of October, 2015.



(L.S.)

Notary Public for South Carolina

My Commission Expires: October 30, 2022.