

**ORIGINAL**

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Appeal from Darlington County

R. Ferrell Cothran, Jr., Circuit Court Judge

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**RECEIVED**

OCT 26 2015

**S.C. Supreme Court**

CURTIS NEALEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000881

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

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The undersigned counsel respectfully requests a thirty day extension, **until November 25, 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 petition for writ of certiorari and accompanying appendix in the case of Walter Alley v. State of South Carolina in the Supreme Court on October 13, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jarrod

Keykendall Harris v. State of South Carolina in the Supreme Court on October 13, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donald Roberts v. State of South Carolina in the Court of Appeals on October 12, 2015. 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 12, 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. 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.

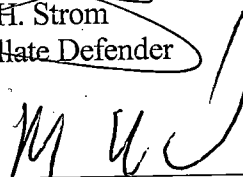
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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



Robert M. Dudek  
Chief Appellate Defender

October 26, 2015

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Darlington County

R. Ferrell Cothran, Jr., Circuit Court Judge

CURTIS NEALEY,

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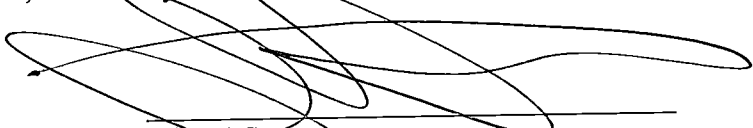
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000881

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 Jessica Kinard, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 26<sup>th</sup> day of October, 2015.

  
John H. Strom  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 26<sup>th</sup> day of October, 2015.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: May 12<sup>th</sup>, 2025.