

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Richland County

L. Casey Manning, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

NOV 18 2015

**S.C. Supreme Court**

MARK A. WATSON

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000620  
\_\_\_\_\_

**PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX**  
\_\_\_\_\_

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenneth Wayne Chiles v. State in this Court on November 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the

case of Ronnie Wilson v. State in this Court on November 12, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio D. Patterson v. State in this Court on October 26, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Terrance McCall v. State in this Court on October 21, 2015. Counsel filed the brief of petitioner in the case of Jaleel Page v. State in this Court on October 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Woodruff v. State in this Court on October 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Yancey Thompson v. State in this Court on September 18, 2015. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of John Thomas Robinson v. State in this Court on September 14, 2015.


3. This request is made in good faith, and not for purposes of delay.

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. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



\_\_\_\_\_  
Tiffany L. Butler  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

November 18, 2015

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Richland County

L. Casey Manning, Circuit Court Judge  
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MARK A. WATSON

PETITIONER,

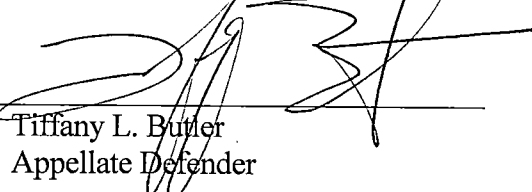
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

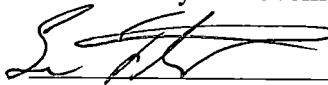
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CERTIFICATE OF SERVICE  
\_\_\_\_\_

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 Clay Mitchell, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 18<sup>th</sup> day of November, 2015.

  
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Tiffany L. Butler  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
This 18<sup>th</sup> day of November, 2015

  
\_\_\_\_\_  
(L.S.)  
Notary Public for South Carolina  
My Commission Expires: October 30, 2022.