

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Charleston County
J.C. Buddy Nicholson, Jr., Circuit Court Judge

RECEIVED

NOV 18 2015

THE STATE,

S.C. Supreme Court

RESPONDENT,

V.

LAMAR SEQUAN BROWN,

PETITIONER

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI TO THE COURT OF APPEALS

Counsel for Lamar Sequan Brown respectfully requests an extension of ten (10) days in which to file the petition for writ of certiorari to the Court of Appeals in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated July 16, 2014. This is first request for an extension pursuant to this Order. In support of this request, counsel shows:

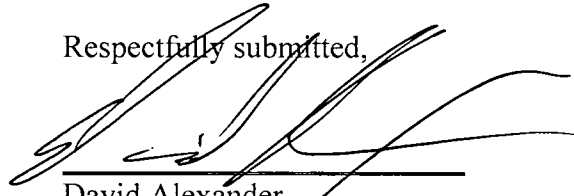
1. The petition for writ of certiorari to the Court of Appeals is due to be served and filed with the Court today.
2. Counsel for Lamar Sequan Brown respectfully submits that good cause exists which warrants the granting of this extension of time.
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daryl Snow with the Court of Appeals on November 12, 2015. Counsel had an oral argument in the case of The State v. Gerald Barrett before this Court on November 10, 2015.

Appeals on November 12, 2015. Counsel had an oral argument in the case of The State v. Gerald Barrett before this Court on November 10, 2015. Counsel filed a return to petition for writ of certiorari in the case of The State v. Noah Mumford with this Court on October 29, 2015. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Noah Mumford v. The State with this Court on October 29, 2015. Counsel filed a petition for rehearing in the case of The State v. William Donald Bolt on October 22, 2015 with the Court of Appeals. Counsel had an oral argument in the case of The State v. Jason Allen Johnson before the Supreme Court on October 20, 2015. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. Sheldon Lamar Kelly with the Supreme 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 the Supreme 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 the Supreme 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

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 ten 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,

A handwritten signature in black ink, appearing to read 'David Alexander', written over a horizontal line.

David Alexander
Appellate Defender

Attorney for Petitioner

November 18, 2015

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THE STATE,

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 to the Court of Appeals in the above case has been served upon Salley W. Elliott, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18th day of November, 2015.



David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18th day
of November, 2015.

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