

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Oconee County  
Alexander S. Macaulay, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

NOV 19 2015

S.C. Supreme Court

SAMMY COWAN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001335

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

The undersigned counsel respectfully requests a thirty day extension 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:

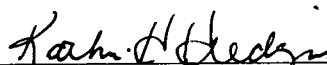
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Gardner with the Court of Appeals on November 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dustin Simmons v. State with the Supreme Court on November 12, 2015. Counsel filed the petition for writ of certiorari

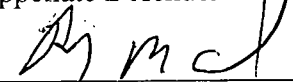
and accompanying appendix in the case of David Watson v. State with the Supreme Court on November 12, 2015. Counsel presented an oral argument in the Supreme Court in the case of State v. Michael Pearson on November 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Telly Manning v. State with the Supreme Court on October 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tony Medford v. State with the Supreme Court on October 19, 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,

  
\_\_\_\_\_  
Kathrine H. Hudgins  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

November 19, 2015

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Oconee County  
Alexander S. Macaulay, Circuit Court Judge

---

SAMMY COWAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

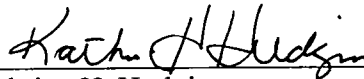
APPELLATE CASE NO. 2015-001335

---

CERTIFICATE OF SERVICE

---

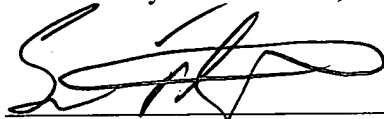
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Patrick Schmeckpeper, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 19th day of November, 2015.



Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 19th day of November, 2015.



(L.S.)

Notary Public for South Carolina  
My Commission Expires: October 30, 2022.