

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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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 a **final thirty (30) day extension, until December 21, 2015**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Mr. 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.

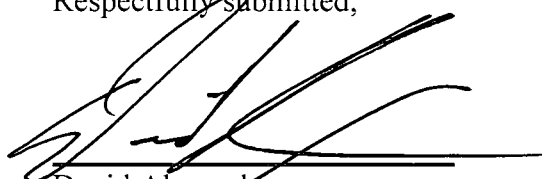
3. Counsel filed Anders brief of appellant and designation of matter in the case of State v. Kemonie Jones in the Court of Appeals on November 13, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daryl Snow with the Court of Appeals on November 12, 2015. Counsel had an oral argument in the case of The State v. Gerald Barrett before this Court on November 10, 2015. 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.

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

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

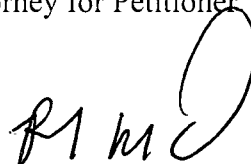
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until December 21, 2015**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition 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

This 19th day of November, 2015.

I consent:

  
Alicia Olive, Esquire