

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County
Brooks P. Goldsmith, Circuit Court Judge

RECEIVED

NOV 30 2015

S.C. Supreme Court

MELINDA RICHMOND,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001289

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for Melinda Richmond respectfully requests an extension of thirty (30) days 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 second request for an extension. In support of this request, counsel shows:

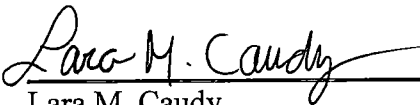
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Melinda Richmond respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. Today, counsel filed a petition for writ of certiorari and accompanying appendix in Antwan Grayson v. State with this Court. On November 23, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Tiphani Marie Parkhurst with this Court. On November 23, 2015, counsel filed the initial brief of appellant and designation of matter in In the Matter of the Care and Treatment of Randall Wade McCoy with the Court of Appeals. On November 12, 2015, counsel filed a petition for rehearing in State v. Don-Survi Chisolm with the Court of Appeals. On November 10, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Detrick Walker v. State with this Court. On November 6, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Saire Castro v. State with this Court. On November 4, 2015, counsel filed the initial brief of appellant and designation of matter in State v. London A. Kelley with the Court of Appeals. On October 26, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Stepheno Jermaine Alston with this Court. On October 22, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Montez Barker v. State with this Court. On October 14, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Ricky L. Hayes with the Court of Appeals. On October 13, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Keith Desue v. State with this Court. On October 12, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Harold Watts v. State with this Court. On October 2, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Levon D. Black v. State with this Court. On October 1, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Carnail Marchindla Graham with the Court of Appeals.

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.

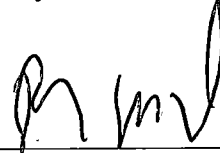
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Lara M. Caudy
Appellate Defender

Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

November 30, 2015

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IN THE SUPREME COURT

Certiorari to Richland County
Brooks P. Goldsmith, Circuit Court Judge

MELINDA RICHMOND,

PETITIONER,

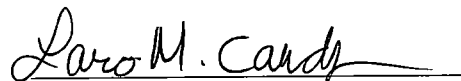
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

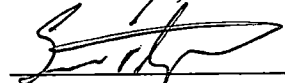
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon J. Clayton Mitchell, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 30th day of November, 2015.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 30th day
of November, 2015.



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