

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

S.C. Supreme Court

MAURICE C. KINARD,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001205

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.

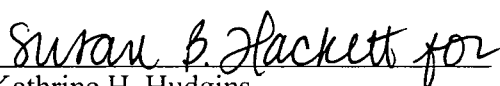
2. Counsel filed the initial brief of appellant and designation of matter in the case of State v. James Gardner with the Court of Appeals on November 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dustin Simmons v. State with this Court on November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

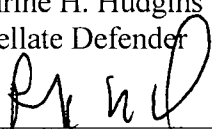
accompanying appendix in the case of David Watson v. State with this Court on November 12, 2015. Counsel presented an oral argument in this Court in the case of State v. Michael Pearson on November 4, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Telly Manning v. State with this 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 this Court on October 19, 2015. Counsel presented an oral argument in the Court of Appeals in the case of Sammy Lee Scarborough v. State on October 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyrone Wade v. State with this Court on October 12, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jason Sanford v. State with this Court on September 30, 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 30, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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PETITIONER,


V.

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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 Daniel Gourley, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 30th day of November, 2015.


Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 30th day of November, 2015.



(L.S.)

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