

 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Berkeley County

William Jeffrey Young, Circuit Court Judge

RECEIVED

DEC 21 2015

S.C. Supreme Court

BRIAN M. CURTIS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001319

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a **final thirty-day extension, until January 20, 2016**, in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by two prior orders of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Norman Stoudemire v. State in this Court on December 18, 2015. Counsel filed petition for rehearing in the case of Thaddeuss Starks v. State in the Court of

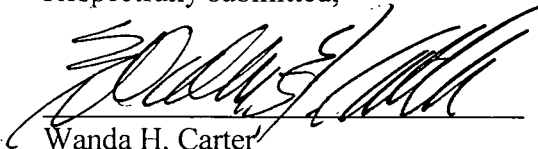
Appeals on December 17, 2015. Counsel filed petition for rehearing in the case of Vondell Sanders v. State with the Court of Appeals on December 10, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Renwick Mose v. State in this Court on November 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rodrick Deon Irby v. State in this Court on November 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Vikki Corbin v. State in this Court on November 20, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Quincy Holley v. State in this Court on November 20, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Raheem Jamar Bonham in this Court on November 9, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Edmond Goodman v. State in this Court on November 6, 2015. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Ruben Ramirez v. State in this Court on October 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Willie Mack v. State in this Court on October 19, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Robert Dale Hughes in the Court of Appeals on October 19, 2015. Counsel argued in the case of Vondell Sanders v. State in the Court of Appeals on October 13, 2015

3. This request is made in good faith, and not for purposes of delay. Counsel is striving to limit the number of extensions requested. Counsel is attempting to complete the cases with the most number of extensions first.

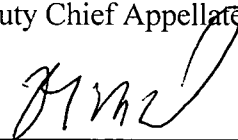
4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until January 20, 2016**, in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



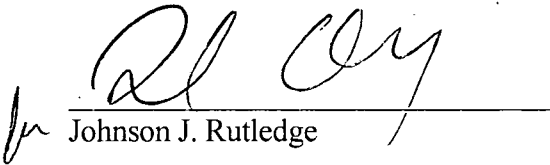
Wanda H. Carter
Deputy Chief Appellate Defender



Robert M. Dudek
Chief Appellate Defender

December 21, 2015

I DO NOT OPPOSE:


Johnson J. Rutledge