

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to York County
Alison Renee Lee., Circuit Court Judge

RECEIVED

DEC 29 2015

S.C. Supreme Court

JEROME WATSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001713

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

The undersigned counsel would respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in the above referenced case. In support of motion, counsel would respectfully show the Court the following exigent circumstances:

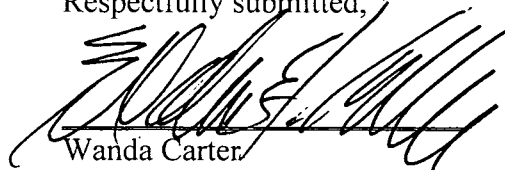
1. The petition for writ of certiorari and appendix are due to be served and filed with today, having been extended by one prior order of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Norman Stoudemire v. State in this Court on December 18, 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 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 purpose of delay.
4. Counsel for the Attorney General's office has been informed of request.

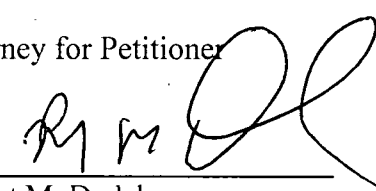
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Wanda Carter', written over a horizontal line.

Wanda Carter
Deputy Chief Appellate Defender

Attorney for Petitioner

A handwritten signature in black ink, appearing to read 'Robert M. Dudek', written over a horizontal line.

Robert M. Dudek
Chief Appellate Defender

December 29, 2015

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to York County
Alison Renee Lee, Circuit Court Judge

RECEIVED

DEC 29 2015

S.C. Supreme Court

JEROME WATSON,

PETITIONER,

V.

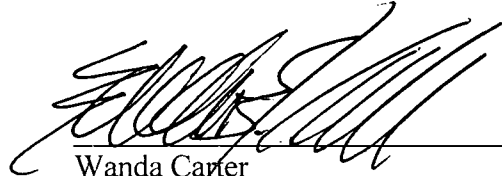
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001713

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 Justin Hunter, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 29th day of December, 2015.



Wanda Carter
Deputy Chief Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 29th day
of December, 2015.

Hevia Levedos (L.S.)

Notary Public for South Carolina
My Commission Expires: July 3, 2023.