

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Charleston County
Eugene C. Griffith, Jr., Circuit Court Judge

RECEIVED

DEC 30 2015

S.C. Supreme Court

SAMUEL THOMPSON JR.,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2015-001420 **1419**

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

Counsel for Samuel Thompson Jr. respectfully requests a **final thirty (30) day extension, until January 29, 2016**, 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.
2. Counsel for Mr. Thompson 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. On December 29, 2015, counsel filed a petition for rehearing in the case of The State v. Andrew Antonio Clemons in the Court of Appeals. On December 29, 2015, counsel filed a petition for rehearing in the case of The State v. Nathaniel Witherspoon in the Court of Appeals. On December 31, 2015, counsel will be filing a reply brief in the case of The State v. Ricky Lee Blackwell, a death penalty case, with this Court. On December 14, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in the case of Anthony Edwards v. The State of South Carolina with this Court. On December 14, 2015 counsel filed a petition for writ of certiorari and accompanying appendix in the case of Andrew S. Plummer v. State of South Carolina with this Court. On December 7, 2015, counsel had an oral argument in the case of The State v. Bradley Gerald Mullins before the Court of Appeals. On December 2, 2015, counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Calvin Jermaine Pompey with this Court. On December 1, 2015, counsel had an oral argument in the case of The State v. Tawanda Allen with this Court. On November 20, 2015, Counsel filed an amended initial brief in the case of The State v. Bryan Rearick with this Court. Counsel, along with co-counsel Lara M. Caudy, filed a petition for rehearing in the case of The State v. Don-Survi Chisolm on November 12, 2015 with the Court of Appeals. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jalann Williams with the Court of Appeals on November 10, 2015. Counsel filed a return to petition for writ of certiorari in the case of Marshall H. Collins v. State of South Carolina on October 30, 2015 with this Court. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training three new appellate defenders and reading all of their writings.**

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.

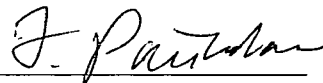
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until January 29, 2016**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

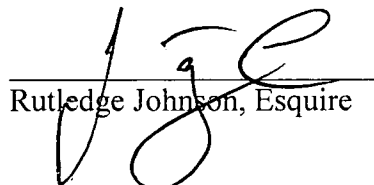
Attorney for Petitioner.



T. Patton Adams
Executive Director/
J. Hugh Ryan, III
General Counsel

This 30th day of December, 2015.

I consent:



Rutledge Johnson, Esquire