

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Clarendon County

George C. James, Jr., Circuit Court Judge

RECEIVED

DEC 30 2015

S.C. Supreme Court

CHARLES JUNIOUS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001498

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

The undersigned counsel respectfully requests a thirty day extension, **until January 29th, 2016**, 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:

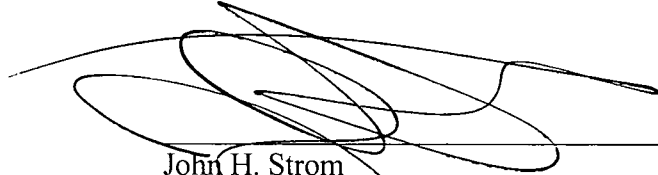
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tunzy Sanders v. State of South Carolina in the Supreme Court on December 21, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v.

Russell Alan Tupper with the Court of Appeals on December 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Fredrick Martineze Pearson v. State of South Carolina in the Supreme Court on December 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Terrance D. Patterson v. State of South Carolina in the Supreme Court on December 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rodney Ivey v. State of South Carolina in the Supreme Court on December 9, 2015. Counsel had an oral argument in the case of The State v. James Clyde Dill, Jr. in the Court of Appeals on December 7, 2015. Counsel filed the Explanation of Appeal Pursuant to Rule 203(d)(1)(B), SCACR in the case of The State v. Favian Hayes with the Court of Appeals on December 2, 2015. Counsel filed the initial reply brief in the case of Jarvis Gibbs v. State of South Carolina in the Supreme Court on November 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Beatson v. State of South Carolina in the Supreme Court on November 30, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Lance L. Miles with the Court of Appeals on November 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Addie Thilavanh v. State of South Carolina in the Supreme Court on November 13, 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,

A large, stylized handwritten signature in black ink, appearing to read 'John H. Strom', written over a horizontal line.

John H. Strom
Appellate Defender

A smaller, stylized handwritten signature in black ink, appearing to read 'R. M. Dudek', written below the signature of John H. Strom.

Robert M. Dudek
Chief Appellate Defender

December 30, 2015

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

RECEIVED

DEC 30 2015

Appeal from Clarendon County

George C. James, Jr., Circuit Court Judge

S.C. Supreme Court

CHARLES JUNIOUS,

PETITIONER,

v.


STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001498

CERTIFICATE OF SERVICE

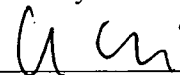
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Daniel Gourley, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 30th day of December, 2015.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

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



(L.S.)
Notary Public for South Carolina
My Commission Expires: May 12th, 2025.