

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED  
DEC 31 2015  
SC Court of Appeals

\_\_\_\_\_  
Certiorari to Richland County  
Robert E. Hood, Circuit Court Judge  
\_\_\_\_\_

RANDOLPH ASHFORD,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001268

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

The undersigned counsel would respectfully request a thirty-day extension 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 one prior order of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Milciades Alacantara v. State in this Court on December 21, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the

case of Reginald Wheeler v. State in this Court on December 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lorenzo R. Nicholson v. State in this Court on December 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Samantha Rhinehart v. State in this Court on November 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenneth Wayne Chiles v. State in this Court on November 16, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ronnie Wilson v. State in this Court on November 12, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antonio D. Patterson v. State in this Court on October 26, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Terrance McCall v. State in this Court on October 21, 2015. Counsel filed the brief of petitioner in the case of Jaleel Page v. State in this Court on October 19, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Woodruff v. State in this Court on October 16, 2015.

3. This request is made in good faith, and not for purposes of delay.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension 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,



Tiffany L. Butler  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

December 31, 2015

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IN THE COURT OF APPEALS

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RANDOLPH ASHFORD,

PETITIONER,

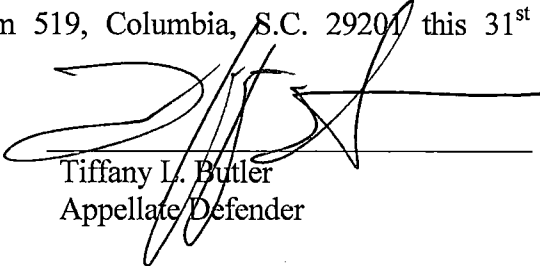
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

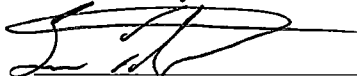
\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

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 Clay Mitchell, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 31<sup>st</sup> day of December, 2015.

  
\_\_\_\_\_  
Tiffany L. Butler  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
This 31<sup>st</sup> day of December, 2015

  
\_\_\_\_\_  
(L.S.)  
Notary Public for South Carolina  
My Commission Expires: October 30, 2022.



# SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense  
1330 Lady Street, Suite 401  
Columbia, South Carolina 29201-3332  
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Columbia, South Carolina 29211-1589  
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Facsimile: (803) 734-1397

Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

December 31, 2015

Ms. Deborah Garrison  
Circuit Court Reporter  
Post Office Box 27145  
Greenville, SC 29616

Dear Ms. Garrison:

Please provide us with the following transcript:

The State v. David Wilkins Ross, Appellate Case Case #: 1979-GS-23-1758  
No.

County: Greenville Date of Trial: October 26, 2015

Presiding Judge: Robin B. Stilwell

Pursuant to the SC Court Reporter's Manual, please number the lines on the paper from 1-25, and include any and all recorded motions, pre and post-trial. Consecutive numbering of pages must be used throughout all volumes regardless of the number of volumes involved. Additionally, please transcribe the **jury selection**, and the State and defense counsel's **opening and closing arguments**, and include the **jury strike sheet**. Please be sure to include **Headers** and a **complete index** including a **listing of exhibits**.

If you are aware of any co-defendants or if the Attorney General's Office has already requested a transcript, please let us know.

To ensure prompt payment, please sign and complete the enclosed CID FORM 3500 and include the original criminal case number (Indictment number) where the space is provided.

Sincerely,

Maria Paula Murdoch  
Administrative Coordinator

cc: S.C. Court of Appeals  
Attorney General's Office

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