

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Florence County
D. Craig Brown, Circuit Court Judge

RECEIVED

JAN 07 2016

SC SUPREME COURT

ROBERT L. JOHNSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001597

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

Counsel for Robert L. Johnson respectfully requests an extension of thirty (30) days 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 second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.

2. Counsel for Robert L. Johnson 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 her caseload, counsel hopes that no further extension requests will be required.

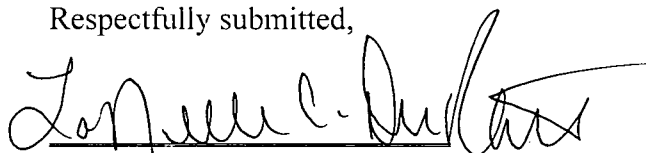
3. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Sugar Ray Robinson v. The State in this Court on January 4, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Robert Singletary v. The State in this Court on December 21, 2015. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Ronnie Harris v. The State in this Court on December 21, 2015. Counsel filed the brief of appellant and designation of matter in the case of The State v. Timothy Crosby with the Court of Appeals on December 16, 2015. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. Alfonzo Alexander in this Court on December 15, 2015. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Louie Chapman v. The State in this Court on December 7, 2015. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Emilio Craig v. The State in this Court on November 30, 2015. Counsel filed the petition for rehearing in the case of The State v. Wayne Scott with the Court of Appeals on November 23, 2015. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Kendall Baccus v. The State in this Court on November 19, 2015. Counsel filed a petition for writ of certiorari in the case of Shawn Reaves v. The State with the United States Supreme Court on November 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Byers v. The State in this Court on November 12, 2015. Counsel filed return to appellant's *pro se* motion to substitute counsel in the case of Arthur Moseley v. The State with the Court of Appeals on November 12, 2015. Counsel filed petition for writ of certiorari and the

accompanying petition for writ of certiorari pursuant to Austin v. State and accompanying appendix in the case of Derrick J. George v. The State in this Court on November 5, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

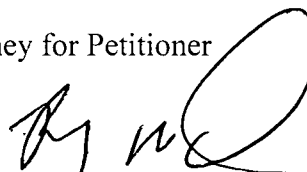
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling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

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

January 7, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County
D. Craig Brown, Circuit Court Judge

ROBERT L. JOHNSON,

PETITIONER,

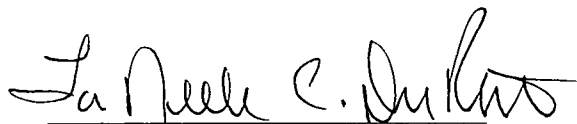
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

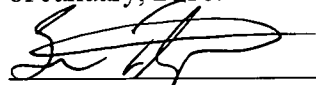
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon J. Croom Hunter, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 7th day of January, 2016.



LaNelle C. Durant
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 7th day
of January, 2016.



(L.S.)

Notary Public for South Carolina

My Commission Expires: October 30, 2022.