

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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

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**ORIGINAL  
RECEIVED**

JAN 13 2016

**SC SUPREME COURT**

JEREMY WRIGHT,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001513

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

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Counsel for Jeremy Wright 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 Jeremy Wright 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. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. William Bolt with the Supreme Court on January 7, 2016. Counsel filed a return to petition for writ of certiorari in the case of State v. Brandon Garren with the Supreme Court on January 7, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kadrin Singleton with the Court of Appeals on January 6, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of William Whitfield v. State with the Supreme Court on January 6, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Supreme Ackbar v. State with the Supreme Court on December 11, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Tykeem May with the Court of Appeals on December 10, 2015. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. Lamar Brown with the Supreme Court on November 30, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Eric Owens with the Court of Appeals on November 25, 2015. Counsel filed the initial brief of respondent and designation of matter in the case of State v. Corey Williams with the Court of Appeals on November 19, 2015. Counsel had an oral argument in the case of State v. Zinah Jennings before the Court of Appeals on November 18, 2015. Counsel filed the brief of appellant and designation of matter in the case of State v. Kemonie Jones with the Court of Appeals on November 13, 2015.

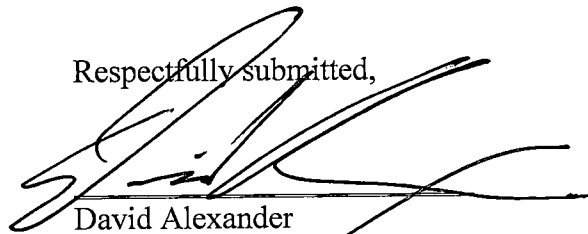
4. Counsel makes this request in good faith and not for purpose of delay.

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,

A large, stylized handwritten signature in black ink, appearing to read 'D. Alexander', written over a horizontal line.

David Alexander  
Appellate Defender

Attorney for Petitioner

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

Robert M. Dudek  
Chief Appellate Defender

January 13, 216

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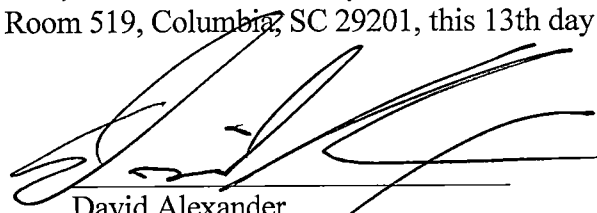
RESPONDENT

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CERTIFICATE OF SERVICE

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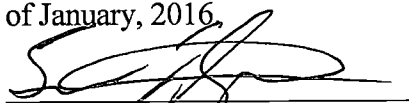
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Jessica Kinard, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 13th day of January, 2016.



David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 13th day  
of January, 2016.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: October 30, 2022.