

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

Eugene C. Griffith, Circuit Court Judge

RECEIVED

JAN 13 2016

SO SUPREME COURT

EDWARD RORECUSE YOUNG,

RESPONDENT,

V.

THE STATE OF SOUTH CAROLINA,

PETITIONER

Appellate Case No. 2015-000785

PETITION FOR EXTENSION TO FILE THE
RETURN TO THE PETITION FOR WRIT OF CERTIORARI

The undersigned counsel respectfully requests a **final thirty day extension, until February 12, 2016**, in which to file the return to the petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The return to the petition for writ of certiorari in this case is due to be served and filed today.
2. On January 13, 2016, counsel has an oral argument in the case of The State of South Carolina v. Whitlee Jones with this Court. On January 12, 2016, counsel had an oral argument in the case of The State of South Carolina v. Antonio Miller with this Court. On January 7, 2016, counsel


filed the petition for writ of certiorari and accompanying appendix in the case of Kenyatta Bryant v. The State of South Carolina with this Court. On January 6, 2016, counsel had an oral argument in the case of The State v. David Judson Penn before the Court of Appeals. On December 31, 2015 counsel filed an initial reply brief in the case of The State of South Carolina v. Ricky Lee Blackwell with the Court of Appeals. On December 29, 2015, counsel also filed another petition for rehearing in the case of The State v. Andrew Antonio Clemons with the Court of Appeals. On December 29, 2015 counsel filed a petition for rehearing in the case of The State of South Carolina v. Nathaniel Witherspoon with the Court of Appeals. 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 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.**

3. As indicated by his consent below, counsel for the state does not oppose this request.

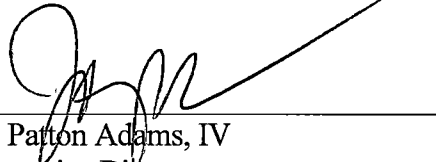
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until February 12, 2016**. Counsel respectfully requests that the time limits for filing the return to the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



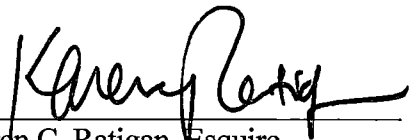
Robert M. Dudek
Chief Appellate Defender



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

January 13, 2016

I do not oppose:



Karen C. Ratigan, Esquire