

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
R. Scott Sprouse, Circuit Court Judge

RECEIVED

JAN 19 2016

SC SUPREME COURT

MICHAEL D. STAGGS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001742

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

Counsel for Michael D. Staggs 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.

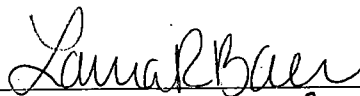
2. Counsel for Michael D. Staggs respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the initial reply brief of appellant in the case of State v. Calvin Miller with the Court of Appeals on January 15, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Stephon Robinson with the Court of Appeals on December 29, 2015. Counsel filed the Brief of Petitioner in the case of Didier Van Sellner v. State with the Supreme Court on December 21, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Desmond Green with the Court of Appeals on December 17, 2015. Counsel filed the Re-Petition for Writ Certiorari in the case of Shannon McGee v. State with the Supreme Court on December 10, 2015.

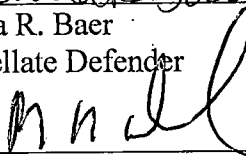
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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,



Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

January 19, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
R. Scott Sprouse, Circuit Court Judge

MICHAEL D. STAGGS,

PETITIONER,

V.

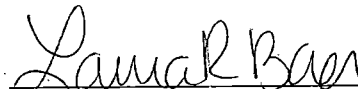
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001742

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 Alicia Olive, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 19th day of January, 2016.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 19th day
of January, 2016.



(L.S.)

Notary Public for South Carolina
My Commission Expires: October 30, 2022.