

**RECEIVED**

JAN 21 2016

**SC SUPREME COURT**

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Barnwell County  
Tanya A. Gee, Circuit Court Judge

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KEVIN BROWN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001659

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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 Kevin Brown 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:

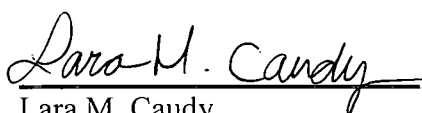
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Kevin Brown respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. On January 13, 2016, counsel filed the petition for writ of certiorari and accompanying appendix in Larry Prophet v. State with this Court. On January 4, 2016, counsel held oral argument in State v. Ryan P. Deleston before the Court of Appeals. On December 29, 2015, counsel filed the petition for writ of certiorari and accompanying appendix in David Rocquemore v. State with this Court. On December 22, 2015, counsel filed the brief of petitioner in Elijah Baylock Jr. v. State with this Court. On December 14, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Terrance Seabrook with the Court of Appeals. On December 8, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Billy Lisenby v. State with this Court. On December 2, 2015, counsel filed the initial brief of appellant and designation of matter in State v. Barry Eugene Lafavor with the Court of Appeals. On November 30, 2015, counsel filed a petition for writ of certiorari and accompanying appendix Antwan Grayson v. State with this Court. On November 23, 2015, counsel filed a petition for writ of certiorari to the Court of Appeals in State v. Tiphani Marie Parkhurst with this Court. On November 23, 2015, counsel filed the initial brief of appellant and designation of matter in In the Matter of the Care and Treatment of Randall Wade McCoy with the Court of Appeals. On November 12, 2015, counsel filed a petition for rehearing in State v. Don-Survi Chisolm with the Court of Appeals. On November 10, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Detrick Walker v. State with this Court. On November 6, 2015, counsel filed a petition for writ of certiorari and accompanying appendix in Saire Castro v. State with this Court. On November 4, 2015, counsel filed the initial brief of appellant and designation of matter in State v. London A. Kelley with the Court of Appeals.

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.

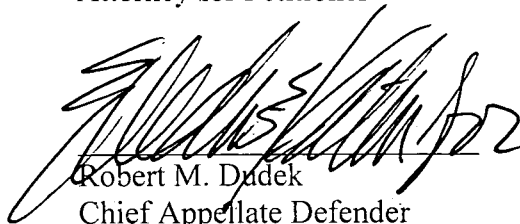
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling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

Respectfully submitted,



Lara M. Caudy  
Appellate Defender

Attorney for Petitioner



Robert M. Dudek  
Chief Appellate Defender

January 21, 2016

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Barnwell County  
Tanya A. Gee, Circuit Court Judge

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KEVIN BROWN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

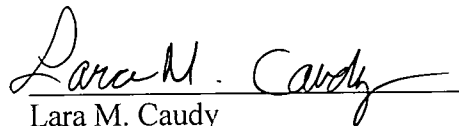
RESPONDENT

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CERTIFICATE OF SERVICE

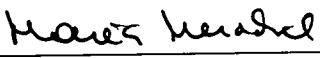
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I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Daniel Gourley, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 21st day of January, 2016.

  
Lara M. Caudy  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 21st day  
of January, 2016.

  
\_\_\_\_\_(L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 3, 2023.