

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to York County

Alison Renee Lee., Circuit Court Judge

SC SUPREME COURT

ORIGINAL

RECEIVED

JAN 28 2016

JEROME WATSON,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001713

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a **final thirty-day extension, until February 29, 2016**, in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by two prior orders of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian M. Curtis v. State in this Court on January 20, 2016. Counsel filed the Anders brief of appellant and designation of matter along with the Record on Appeal in the case of State v. James L. Singleton in the Court of Appeals on

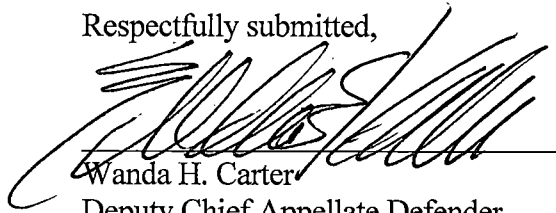
January 13, 2016. Counsel filed petition for rehearing in the case of State v. Damian Anderson in the Court of Appeals on January 7, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Frank Beckham v. State in this Court on January 7, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derrick Prescott v. State in this Court on January 6, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Willie Dow v. State in this Court on December 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Norman Stoudemire v. State in this Court on December 18, 2015. Counsel filed petition for rehearing in the case of Thaddeuss Starks v. State in the Court of Appeals on December 17, 2015. Counsel filed petition for rehearing in the case of Vondell Sanders v. State with the Court of Appeals on December 10, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Renwick Mose v. State in this Court on November 30, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rodrick Deon Irby v. State in this Court on November 30, 2015.

3. This request is made in good faith, and not for purposes of delay. Counsel is striving to limit the number of extensions requested. Counsel is attempting to complete the cases with the most number of extensions first.


4. As indicated by his consent below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty-day extension, until February 29, 2016**, in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



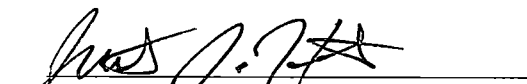
Wanda H. Carter
Deputy Chief Appellate Defender



Robert M. Dudek
Chief Appellate Defender

January 28, 2016

I DO NOT OPPOSE:



Justin Hunter