

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Aiken County  
R. Knox McMahon, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

JAN 28 2016

JOSHUA FORREST,

**SC SUPREME COURT**

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001045

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

The undersigned counsel would respectfully request a thirty-day extension 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 one prior order of this Court.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Robinson v. State in this Court on January 19, 2016. Counsel filed the Anders brief of Appellant and Record on Appeal in the case of State v. Jim Edward Feagin in the Court of Appeals on January 14, 2016. Counsel filed the

petition for writ of certiorari and accompanying appendix and the brief of appellant pursuant to White v. State in the case of Robert S. Horton v. State in this Court on January 8, 2016. Counsel filed the petition for an order to reconstruct the record of appellant's trial transcript, or, in the alternative, an order setting aside his convictions and ordering a new trial in the case of State v. Ivory Blackshire in the Court of Appeals on January 4, 2016. Counsel filed the Anders brief of Appellant and Record on Appeal in the case of State v. Roemain Jamil Brunson in the Court of Appeals on December 29, 2015. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Nicholas Nesmith v. State in this Court on December 16, 2015. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Keith O. Williams v. State in this Court on December 7, 2015. Counsel argued in the case of State v. Alexander L. Hunsberger in this Court on December 2, 2015.

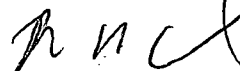
3. This request is made in good faith, and not for purposes of delay.

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. 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,



Susan B. Hackett  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

January 28, 2016

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Aiken County

R. Knox McMahon, Circuit Court Judge

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JOSHUA FORREST,

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, S.C. 29201 this 28<sup>th</sup> day of January, 2016.

  
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Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 28<sup>th</sup> day of January 2016.

  
\_\_\_\_\_  
(L.S.)  
Notary Public for South Carolina  
My Commission Expires: October 30, 2022.