

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Florence County  
D. Craig Brown, Circuit Court Judge

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RECEIVED

FEB -8 2016

SC SUPREME COURT

ROBERT L. JOHNSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001597

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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 Robert L. Johnson respectfully requests a **final thirty (30) day extension, until March 9, 2016**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.

2. Counsel for Robert L. Johnson 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.

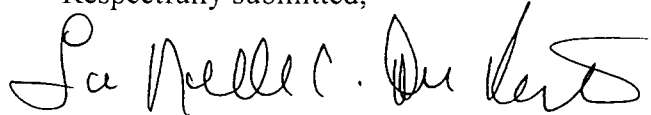
3. Counsel filed brief of petitioner pertaining to White v. State belated appeal in the case of Christopher Pringle v. The State with the Court of Appeals on February 4, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of David Sheriff v. The State in this Court on January 27, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Rodney Neals v. The State in this Court on January 20, 2016. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. Wayne Scott in this Court on January 14, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Quartis Hemingway with the Court of Appeals on January 13, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Paul Richards v. The State in this Court on January 12, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Johnny Sexton with the Court of Appeals on January 8, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Sugar Ray Robinson v. The State in this Court on January 4, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Robert Singletary v. The State in this Court on December 21, 2015. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Ronnie Harris v. The State in this Court on December 21, 2015. Counsel filed the brief of appellant and designation of matter in the case of The State v. Timothy Crosby with the Court of Appeals on December 16, 2015. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of The State v. Alfonzo Alexander in this Court on December 15, 2015.

4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

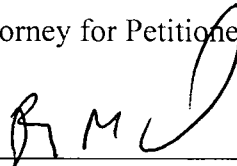
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 9, 2016**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 8<sup>th</sup> day of February, 2016.

I consent:



J. Croom Hunter, Esquire