

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Lexington County
Brooks P. Goldsmith, Circuit Court Judge

RECEIVED

FEB 10 2016

SC SUPREME COURT

RICHARD O. HATCHELL,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001876

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

Counsel for Richard O. Hatchell 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 Richard O. Hatchell 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.

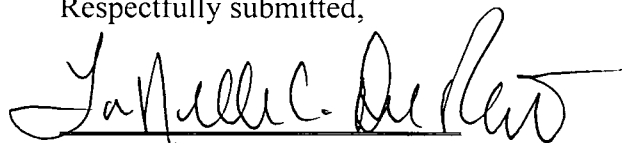
3. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Daevon Williams with the Court of Appeals on February 9, 2016. Counsel filed brief of petitioner pertaining to White v. State belated appeal in the case of Christopher Pringle v. The State with the Court 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 has been informed of this request.

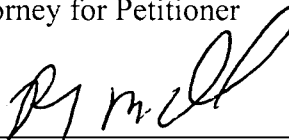
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling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

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

February 10, 2016

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Certiorari to Lexington County
Brooks P. Goldsmith, Circuit Court Judge

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PETITIONER,

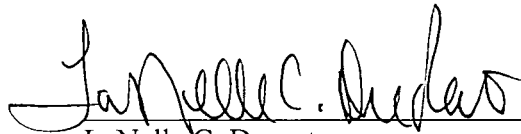
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

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 Patrick Schmeckpeper, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 10th day of February, 2106.



LaNelle C. Durant
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 10th day
of February, 2016.

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