

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
Edward W. Miller, Circuit Court Judge

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FEB 18 2016

SC SUPREME COURT

ROBERT MAX WATKINS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002191

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

Counsel for Robert Max Watkins 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 Robert Max Watkins 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 is currently out on maternity leave as of February 8, 2016. On February 4, 2016, counsel filed a petition for rehearing in Frankie Lee Bryant v. State with the Court of Appeals. On February 2, 2016, counsel filed the petition for writ of certiorari and accompanying appendix in Perry B. Buchanan v. State with this Court. On January 26, 2016, counsel filed the initial brief of appellant and designation of matter in State v. Kyndra Howell with the Court of Appeals. 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 had an 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.

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,

Susan B. Hackett for
Lara M. Caudy
Appellate Defender

Attorney for Petitioner

R M Dudek
Robert M. Dudek
Chief Appellate Defender

February 18, 2016

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IN THE SUPREME COURT

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ROBERT MAX WATKINS,

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V.

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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 Karen C. Ratigan, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18th day of February, 2016.

Susan B. Hackett for
Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18th day
of February, 2016.

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