

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Spartanburg County

R. Scott Sprouse, Circuit Court Judge

RECEIVED

FEB 18 2016

SC SUPREME COURT

MICHAEL D. STAGGS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001742

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

Counsel respectfully requests a **final extension of thirty (30) days until March 21, 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 is due to be served and filed with the Court today.
2. Counsel 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 his 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. Christopher Mejean with the Court of Appeals on February 16, 2016. Counsel had an oral argument in the case of The State v. O'neal Bernard Byrdic, Jr. in the Court of Appeals on February 9, 2016. Counsel filed the petition for rehearing in the case of The State v. James Clyde Dill with the Court of Appeals on January 28, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gregg C. Hiers v. The State of South Carolina in the Supreme Court on January 13, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Curtis Nealey v. The State of South Carolina in the Supreme Court on December 29, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tunzy Sanders v. State of South Carolina in the Supreme Court on December 21, 2015. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Russell Alan Tupper with the Court of Appeals on December 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Fredrick Martineze Pearson v. State of South Carolina in the Supreme Court on December 18, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Terrance D. Patterson v. State of South Carolina in the Supreme Court on December 14, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Rodney Ivey v. State of South Carolina in the Supreme Court on December 9, 2015.

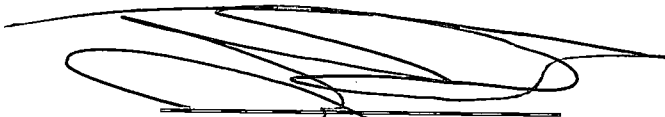
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

will hopefully become more manageable in the near future, and less extensions will need to be requested.

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 21, 2016**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



John H. Strom  
Appellate Defender


Attorney for Petitioner



Robert M. Dudek  
Chief Appellate Defender

This 18th day of February, 2016

I Consent:



Alicia Olive, Esquire