

 ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Barnwell County  
Tanya A. Gee, Circuit Court Judge

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KEVIN BROWN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2015-001659

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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 Kevin Brown respectfully requests a **final thirty (30) day extension, until March 23, 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 Kevin Brown 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 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.

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

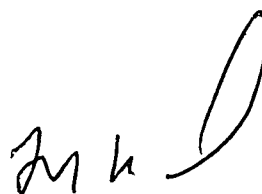
5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 23, 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,

  
Lara M. Caudy  
Appellate Defender

Attorney for Petitioner.




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Robert M. Dudek  
Chief Appellate Defender

This 22<sup>nd</sup> day of February, 2016.

I consent:



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for Daniel Gourley, Esquire