

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Florence County

D. Craig Brown, Circuit Court Judge

RECEIVED

MAR - 2 2016

SC SUPREME COURT

GREGORY DANIELS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002033

**PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND APPENDIX**

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

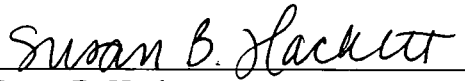
1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed a petition for writ of certiorari in the case of David Gerrard Johnson v. State in the Supreme Court of the United States on March 1, 2016. Counsel

filed the initial brief of appellant and designation of matter in the case of State v. Wayne Gary Polite in the Court of Appeals on February 22, 2016. Counsel filed the petition for rehearing in the case of State v. Tyrel R. Collins in the Court of Appeals on February 4, 2016. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. Marty Baggett in this Court on February 1, 2016. Counsel filed a petition for writ of certiorari to the Court of Appeals in the case of Edward Whitner v. State in this Court on January 29, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Wesley Gore v. State in this Court on January 29, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Robinson v. State in this Court on January 19, 2016. Counsel filed the Anders brief of Appellant and Record on Appeal in the case of State v. Jim Edward Feagin in the Court of Appeals on January 14, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix and the brief of appellant pursuant to White v. State in the case of Robert S. Horton v. State in this Court on January 8, 2016. Counsel filed the petition for an order to reconstruct the record of appellant's trial transcript, or, in the alternative, an order setting aside his convictions and ordering a new trial in the case of State v. Ivory Blackshire in the Court of Appeals on January 4, 2016.

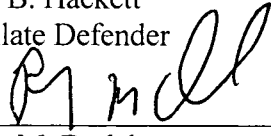
3. This request is made in good faith, and not for purposes of delay.

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. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Susan B. Hackett
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

March 2, 2016

STATE OF SOUTH CAROLINA

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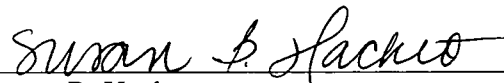
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

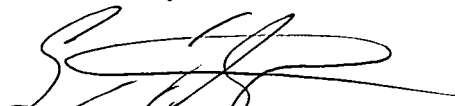
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon J. Croom Hunter, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 2nd day of March, 2016.



Susan B. Hackett
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 2nd day of March, 2016.



(L.S.)

Notary Public for South Carolina
My Commission Expires: October 30, 2022.