

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Berkeley County  
Eugene C. Griffith, Jr., Circuit Court Judge

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**RECEIVED**

MAR -2 2016

**SO SUPREME COURT**

DONSURVI CHISOLM,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001735

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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 DonSurvi Chisolm 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 DonSurvi Chisolm 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 filing the initial reply brief of appellant in the case of State v. Travis Polite with the Court of Appeals on March 2, 2016. Counsel filed the petition for writ of certiorari in the case of Sheldon Oakman v. State with this Court on February 29, 2016. Counsel filed the petition for writ of certiorari in the case of Freddie Edwards, Jr. v. State with this Court on February 29, 2016. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals in the case of Norman J. Hayes v. State with this court on February 22, 2016. Counsel presented an oral argument in the Court of Appeals in the case of State v. Mandy L. Smith on February 9, 2016. Counsel filed the petition for writ of certiorari in the case of Anthony M. Riggins v. State with this court on February 3, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Calvin Miller with the Court of Appeals on January 15, 2016.

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

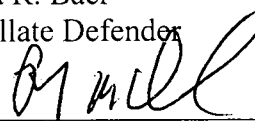
5. Counsel for the Attorney General's office has been informed of this request.

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,



Laura R. Baer  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

Attorney for Petitioner

March 2, 2016

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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DONSURVI CHISOLM,

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STATE OF SOUTH CAROLINA,

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CERTIFICATE OF SERVICE

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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 Justin Hunter, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 2nd day of March, 2016.



Laura R. Baer  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 2nd day  
of March, 2016.

 (L.S.)

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