

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Richland County

Robert E. Hood, Circuit Court Judge

RECEIVED

MAR - 9 2016

SC SUPREME COURT

VANDER DAVON MEETZE,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

APPELLATE CASE NO. 2015-001013

PETITION FOR EXTENSION TO FILE THE
RETURN TO THE PETITION FOR WRIT OF CERTIORARI

The undersigned counsel respectfully requests a **final thirty day extension, until April 8, 2016**, in which to file the return to the petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The return to the petition for writ of certiorari in this case is due to be served and filed today.
2. On February 25, 2016 counsel filed a petition for rehearing in the case of State v. Ryan P. Deleston with the Court of Appeals. On February 18, 2016, counsel filed the return to petition for writ of certiorari in the case of Edward Rorecuse Young v. State with this Court. On

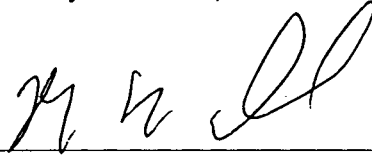
February 18, 2016, counsel was co-counsel on the death penalty initial brief of appellant in the case of State v. Luzenski Allen Cottrell that was filed with this Court. On February 12, 2016, counsel filed the return to petition for writ of certiorari in the case of David Carmichael v. State with this Court. On February 8, 2016, counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Don-Survi Chisolm with this Court. On January 29, 2016, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Samuel Thompson v. State with this Court. On January 15, 2016, counsel filed the initial brief of appellant and designation of matter in the case of State v. Thomas James with the Court of Appeals. On January 13, 2016, counsel had an oral argument in the case of State v. Whitlee Jones with this Court. On January 12, 2016, counsel had an oral argument in the case of State v. Antonio Miller with this Court. On January 7, 2016, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenyatta Bryant v. State with this Court. On January 6, 2016, counsel had an oral argument in the case of State v. David Judson Penn before the Court of Appeals. On December 31, 2015 counsel filed an initial reply brief in the case of State v. Ricky Lee Blackwell with the Court of Appeals. On December 29, 2015, counsel also filed another petition for rehearing in the case of State v. Andrew Antonio Clemons with the Court of Appeals. On December 29, 2015 counsel filed a petition for rehearing in the case of State v. Nathaniel Witherspoon with the Court of Appeals. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training three new appellate defenders and reading all of their writings.**

3. As indicated by his consent below, counsel for the state does not oppose this request.

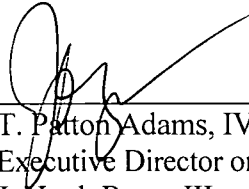
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until April 8, 2016**. Counsel respectfully requests that the time limits for filing the return to the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



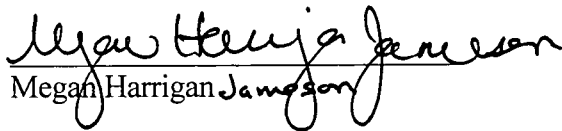
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams, IV
Executive Director or
J. Hugh Ryan, III
General Counsel

March 9, 2016

I do not oppose:



Megan Harrigan Jamerson