

 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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RECEIVED

MAR 23 2016

SC SUPREME COURT

KEVIN BROWN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2015-001659

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

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The undersigned counsel respectfully requests a **final two day extension, until March 25, 2016**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following **extraordinary circumstances**:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. **Previous Counsel, Lara Caudy, has been out of the office on maternity leave. This case was reassigned to John H. Strom (“counsel”) on March 15, 2016. Counsel has discovered a very meritorious issue that he regretfully needs more time to brief. Hence, this unusual final request for a two day extension.**

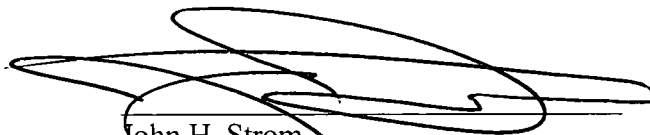
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Landon T. Sanders v. The State of South Carolina on March 23, 2016. Counsel filed the petitioner for writ of certiorari and accompanying appendix in the case of Michael Staggs v. The State of South Carolina in the Supreme Court on March 21, 2016. Counsel attended a record reconstruction hearing in the case of The State of South Carolina v. Phyllis Lane on March 21, 2016 in Bennettsville, SC. Counsel filed the petition for petitioner's return to state's motion to dismiss or in alternative to remand the case to general sessions in the case of Donald Roberts v. The State of South Carolina in the Supreme Court on March 17, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Taquan Brown with the Court of Appeals on March 14, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Gary Fraley with the Court of Appeals on March 9, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Arthur Thomas with the Court of Appeals on March 3, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Junious v. The State of South Carolina in the Supreme Court on February 29, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Danny Cortez Brown v. The State of South Carolina in the Supreme Court on February 22, 2016. 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.

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

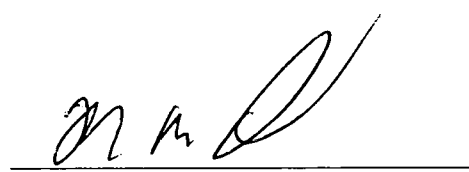
4. This request is made in good faith, and not for purposes of delay. Counsel understands that fourth extensions are disfavored, but counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and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

WHEREFORE, the undersigned counsel would respectfully request a **final two day extension, until March 25, 2016**. In the alternative counsel requests such a lesser time as this Court is willing to grant. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



John H. Strom  
Appellate Defender




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Robert M. Dudek  
Chief Appellate Defender

March 23, 2016

I do not oppose:



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for Daniel Gourley, Esquire