

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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

RECEIVED  
APR - 1 2016  
SC SUPREME COURT

DONSURVI CHISOLM,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001735

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

The undersigned counsel respectfully requests a **final thirty day extension, until May 2, 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. Counsel filed the initial brief of appellant in the case of State v. David Glover with the Court of Appeals on March 30, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Vanessa Laquetta Frayer with the Court of Appeals on March 11, 2016. Counsel filed the petition for rehearing in the case of State v. Dennis M. Penny, II with the Court

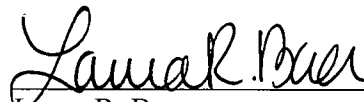
of Appeals on March 3, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Travis Polite with the Court of Appeals on March 2, 2016. Counsel filed the petition for writ of certiorari in the case of Sheldon Oakman v. State with this Court on February 29, 2016. Counsel filed 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.

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.

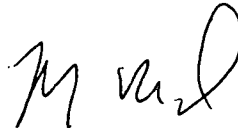
WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until May 2, 2016**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Laura R. Baer  
Appellate Defender

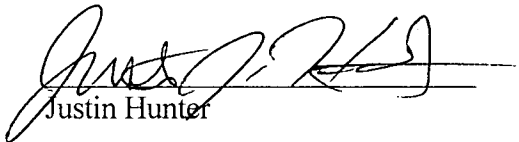


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Robert M. Dudek  
Chief Appellate Defender

April 1, 2016

I do not oppose:



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Justin Hunter