

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Charleston County
Roger R. Henderson, Circuit Court Judge

RECEIVED

APR - 7 2016

SC SUPREME COURT

TIMOTHY YOUNG,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002162

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for Timothy Young 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 Timothy Young 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.

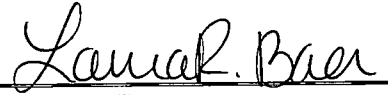
3. Counsel filed the reply to brief of respondent in the case of Didier Van Sellner v. State with this Court on April 6, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Justin Jermaine Johnson with the Court of Appeals on April 4, 2016. Counsel filed the initial brief 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.

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

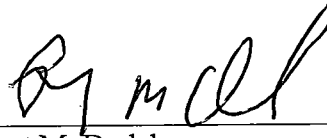
5. Counsel for the Attorney General's office has been informed of this request.

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

April 7, 2016

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IN THE SUPREME COURT

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TIMOTHY YOUNG,

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STATE OF SOUTH CAROLINA,

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CERTIFICATE OF SERVICE

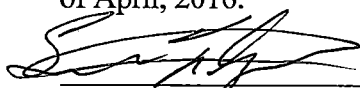
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon J. Rutledge Johnson, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 7th day of April, 2016.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 7th day
of April, 2016.



(L.S.)

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