

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Barnwell County
Doyet A, Early, III, Circuit Court Judge

ORIGINAL
RECEIVED

APR 18 2016

SC SUPREME COURT

TUNZY SANDERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001970

PETITION FOR EXTENSION OF TIME TO FILE
THE RETURN OPPOSING THE STATE'S MOTION
TO STRIKE PETITION FOR WRIT OF CERTIORARI,
APPENDIX, AND SUPPLEMENTAL APPENDICES FOR
FAILURE TO COMPLY WITH RULE 210(c), SCACR

The undersigned counsel respectfully requests a **ten day extension, until April 28, 2016**, in which to file the return opposing the state's motion to strike petition for writ of certiorari, appendix and supplemental appendices for failure to comply with rule 210(c), SCACR. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

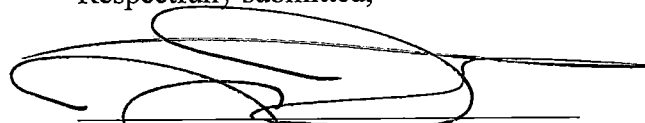
1. The return opposing the state's motion to seal all documents on appeal as overbroad in this case is due to be served and filed today.
2. Counsel filed the consent motion to hold the appeal in abeyance and remand for resentencing in the case of The State v. Darrell Ervin Raines, Jr. with the Court of Appeals on April 7, 2016. Counsel filed the initial reply brief of appellant in the case of The State v. John Henry Lowery, II with the Court of Appeals on April 4, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kevin Brown v. The State of South

Carolina in the Supreme Court on March 25, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Landon T. Sanders v. The State of South Carolina in the Supreme Court on March 23, 2016. Counsel filed the petition 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 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.

3. 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 **ten day extension, until April 28, 2016**. Counsel respectfully requests that the time limits for filing the return opposing the state's motion to seal all documents on appeal as overbroad be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John H. Strom", written over a horizontal line.

John H. Strom
Chief Appellate Defender

April 18, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Barnwell County
Doyet A, Early, III, Circuit Court Judge

TUNZY SANDERS,

PETITIONER,

V.

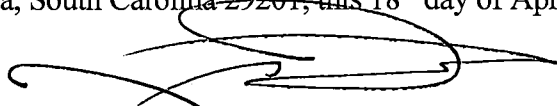
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2014-001970

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file the return opposing the state's motion to seal all documents on appeal as overbroad in the above referenced case has been served upon David Spencer, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 18th day of April, 2016.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 18th day of April, 2016.



(L.S.)

Notary Public for South Carolina

My Commission Expires: May 12, 2025.