

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

Certiorari to Spartanburg County APR 18 2016
R. Scott Sprouse, Circuit Court Judge

SC SUPREME COURT

JOSEPH G. COBB,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001960

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

Counsel for Joseph G. Cobb respectfully requests a **final thirty (30) day extension, until May 18, 2016**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Joseph G. Cobb 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 his caseload, counsel hopes that no further extension requests will be required.

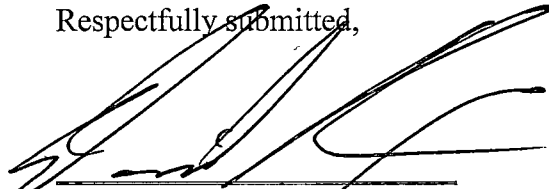
3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Gerald Williams with the Court of Appeals on April 6, 2016. Counsel filed a petition for rehearing in the case of State v. Gerald Barrett with the Court of Appeals on April 5, 2016. Counsel filed the initial reply brief in the case of In the Matter of the Care and Treatment of Daquan Johnson with the Supreme Court on March 31, 2016. Counsel filed the brief of appellant and designation of matter in the case of State v. Jeremiah Johnson with the Court of Appeals on March 30, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Keith Gadsden v. State with the Supreme Court on March 24, 2016. Counsel had an oral argument in the case of State v. Willie Williams before the Court of Appeals on March 9, 2016. Counsel had an oral argument in the case of Darrell Goss v. State before the Court of Appeals on March 7, 2016. Along with co-counsel Chief Appellate Defender Robert M. Dudek, on February 29, 2016, counsel filed a motion for stay, for a new PCR hearing before a different circuit judge, and, alternatively, to alter or amend the judgment pursuant to Rule 59(e) in the death penalty case of Marion Lindsey v. State with the Court of Common Pleas in Spartanburg County. Along with co-counsel Chief Appellate Defender Robert M. Dudek, on February 26, 2016, counsel filed a renewed petition for extraordinary relief in the Supreme Court's original jurisdiction in the death penalty case of Marion Lindsey v. State. Counsel filed the initial reply brief in the case of In the Matter of the Care and Treatment of Jeffrey Allen Chapman with the Supreme Court on March 2, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Jeremy Wright v. State with the Supreme Court on February 17, 2016.

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

5. Counsel for the Attorney General's office consents to this request as shown by signature below.


WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until May 18, 2016**, 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,



David Alexander
Appellate Defender

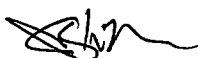
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 18th day of April, 2016.

I consent:



fu Alicia Olive, Esquire