

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Williamsburg County  
Steven H. John, Circuit Court Judge

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**RECEIVED**  
APR 27 2016  
SC SUPREME COURT

ANDRE WALLACE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002200

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

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Counsel for Andre Wallace 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 Andre Wallace 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.

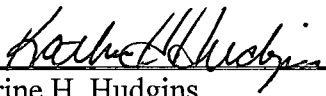
3. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Maurice Glover v. The State of South Carolina on April 20, 2016 with this Court. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher E. Martin on April 18, 2016 with the Court of Appeals. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon Heath Clark v. The State of South Carolina on April 6, 2016 with this Court. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Waymon Eugene Newton on March 30, 2016 with the Court of Appeals. Counsel filed a petition for writ of certiorari and accompanying appendix in the case of Steven McElrath v. The State of South Carolina on March 18, 2016 with this Court. Counsel filed a petition for writ of certiorari in the case of Mickey Lane Mayberry v. The State of South Carolina on March 18, 2016 with this Court. Counsel filed a petition for rehearing in the case of Willis Weary v. The State of South Carolina on March 15, 2016 with the Court of Appeals. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Michael Gentile on March 9, 2016 with the Court of Appeals. Counsel filed a petition for rehearing in the case of The State v. Sammy Lee Scarborough on March 4, 2016 with the Court of Appeals. Counsel filed a petition for rehearing on the case of Stephen Smalls v. The State on February 22, 2016, with the Court of Appeals. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Marshall Dewitt McGaha v. The State on February 22, 2016, with this Court. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Gary R. Thompson on February 22, 2016, with this Court. Counsel filed the brief of petitioner in the case of Willie J. Adams v. The State on February 22, 2016 with this Court.

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

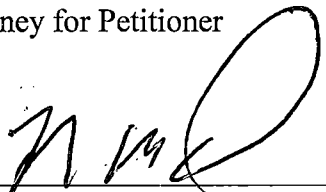
5. Counsel for the Attorney General's office has been informed of this request.

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,

  
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Kathrine H. Hudgins  
Appellate Defender

Attorney for Petitioner

  
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Robert M. Dudek  
Chief Appellate Defender

April 27, 2016

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ANDRE WALLACE,

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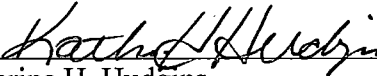
RESPONDENT

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CERTIFICATE OF SERVICE

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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 Julie Coleman, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 27<sup>th</sup> day of April, 2016.

  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 27<sup>th</sup> day  
of April, 2016.

  
\_\_\_\_\_(L.S.)

Notary Public for South Carolina  
My Commission Expires: July 3, 2023.