

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Georgetown County  
Steven H. John, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

MAY -2 2016

SC SUPREME COURT

THE STATE,

RESPONDENT,

V.

SHANNON MCGEE,

PETITIONER

Appellate Case No. 2014-000297

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**PETITION FOR EXTENSION TO FILE  
THE REPLY TO THE RETURN TO THE  
PETITION FOR WRIT OF CERTIORARI**  
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The undersigned counsel would respectfully request a **ten-day extension, until May 12, 2016**, in which to file the reply to the return to the petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The reply to the return to the petition for writ of certiorari in this case is due to be served and filed today, having been extended by one prior order of this Court.

2. Counsel will file the petition for writ of certiorari in the case of DonSurvi Chisolm v. State with this Court today, May 2, 2016. Counsel filed the petition for writ of certiorari in the case of Ashley Eugene Moore v. State with the Supreme Court of the United States on April 26, 2016. Counsel filed the petition for writ of certiorari in the case of Robert Max Watkins v. State with this Court on April 20, 2016. Counsel filed the

initial reply brief of appellant in the case of State v. Marvin Brock Johnson with this the Court of Appeals on April 14, 2016. 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.

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 **final ten-day extension, until May 12, 2016**, in which to file the reply to the return to the petition for writ of certiorari in this case. Counsel requests that the time limits for filing the reply to the return to the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Laura R. Baer  
Appellate Defender

May 2, 2016

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THE STATE,

RESPONDENT,

V.

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CERTIFICATE OF SERVICE

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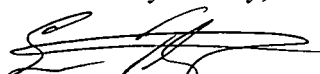
The undersigned attorney hereby certifies the petition in which to file the reply to the return to the petition for writ of certiorari in the above referenced case has been served upon Jessica Kinard, Esquire, Assistant General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, this 2nd day of May, 2016.



Laura R. Baer  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 2nd day of May, 2016.



(L.S.)

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