

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

MAY -9 2016

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

SC SUPREME COURT

TIMOTHY YOUNG,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002162

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final thirty day extension, until June 8, 2016**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the petition for writ of certiorari in the case of DonSurvi Chisolm v. State with this Court on 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.

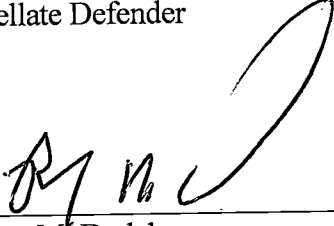
3. As indicated by his consent below, counsel for the state does not oppose this request.

4. 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 thirty day extension, until June 8, 2016**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

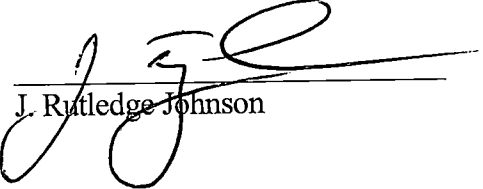
Respectfully submitted,

Suzan B. Hackett for
Laura R. Baer
Appellate Defender


Robert M. Dudek
Chief Appellate Defender

May 9, 2016

I do not oppose:


J. Rutledge Johnson