

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Anderson County

R. Lawton McIntosh, Circuit Court Judge

RECEIVED

MAY 18 2016

SC SUPREME COURT

MELODY HOLMES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-001933

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

The undersigned counsel respectfully requests a thirty day extension 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.

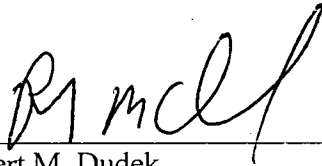
2. On May 11, 2016 counsel, with co-counsel Keir M. Weyble, filed the petition for writ of certiorari in the case of Sammie Louis Stokes v. State with the Supreme Court of the United States. On May 11, 2016, counsel, with co-counsel Susan Hackett and David

Alexander filed the petition for writ of certiorari to the Court of Appeals in the case of Brett D. Parker v. State with this Court. On May 11, 2016, counsel filed the petition for writ of certiorari in the case of Dedric L. Isreal v. State with this Court. On April 27, 2016, counsel filed the petition for writ of certiorari in the death penalty case of Anthony Woods v. State with this Court. On April 27, 2016, counsel filed the brief of petitioner in the case of State v. Raheem D. King with this Court. On April 8, 2016, counsel filed the return to petition for writ of certiorari in the case of Vander Davon Meetze v. State with this Court. On April 6, 2016, counsel filed the initial brief of appellant and designation of matter in the case of State v. David Young with the Court of Appeals. On March 29, 2016, counsel filed the initial brief of appellant and designation of matter in the case of State v. Elias James Walker with the Court of Appeals. On March 23, 2016, counsel filed the return to petition for writ of certiorari in the case of Levi C. Wells v. State with this Court. On March 14, 2016 counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. Nathaniel Witherspoon with this Court. On March 10, 2016 counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. Andrew Antonio Clemons with this Court. On February 25, 2016 counsel filed a petition for rehearing in the case of State v. Ryan P. Deleston with the Court of Appeals. On February 18, 2016, counsel filed the return to petition for writ of certiorari in the case of Edward Rorecuse Young v. State with this Court. On February 18, 2016, counsel was co-counsel on the death penalty initial brief of appellant in the case of State v. Luzenski Allen Cottrell that was filed with this Court. On February 12, 2016, counsel filed the return to petition for writ of certiorari in the case of David Carmichael v. State with this Court. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training three new appellate defenders and reading all of their writings.**

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 thirty day extension. 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,



Robert M. Dudek
Chief Appellate Defender

May 18, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Anderson County

R. Lawton McIntosh, Circuit Court Judge

MELODY HOLMES,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

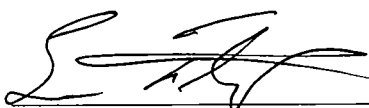
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Patrick Schmeckpeper, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 18th day of May, 2016.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR PETITIONER.

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



(L.S.)
Notary Public for South Carolina
My Commission Expires: October 30, 2022.