

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

RECEIVED

MAY 25 2016

SC SUPREME COURT

\_\_\_\_\_  
Certiorari to Richland County  
Tanya A. Gee, Circuit Court Judge  
\_\_\_\_\_

RICHARD KOUGH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002311

\_\_\_\_\_  
**PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX**  
\_\_\_\_\_

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

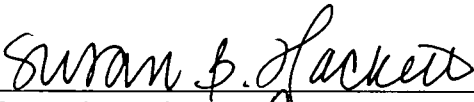
1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Michael Gonzales v. State in this Court on May 19, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Chadwick Anderson v. State in this Court

on May 17, 2016. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Tyrel Collins in this Court on May 13, 2016. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Brett Parker in this Court on May 11, 2016, as a co-counsel with Robert M. Dudek and David Alexander. Counsel filed the petition for rehearing in the case of State v. James Simmons in the Court of Appeals on May 5, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Kendall Tyus in the Court of Appeals on May 4, 2016. Counsel filed the brief of petitioner in the case of State v. Walter M. Bash in this Court on April 25, 2016. Counsel argued in the case of State v. Steven Otts in the Court of Appeals on April 20, 2016. Counsel filed the Anders brief of appellant and Record on Appeal in the case of State v. Anthony Markale Porterfield in the Court of Appeals on April 13, 2016. Counsel attended the Reconstruction Hearing in the case of State v. Ivory Blackshire at the Aiken County Courthouse on April 5, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donneil Woods v. State in this Court on April 1, 2016. Counsel filed the brief of appellant in the case of State v. Robert Lee Wright in the Court of Appeals on March 29, 2016.

3. This request is made in good faith, and not for purposes of delay.

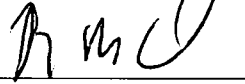
WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in this case. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Susan B. Hackett  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

May 25, 2016

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STATE OF SOUTH CAROLINA,

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\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

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 Jessica Kinard, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 25<sup>th</sup> day of May, 2016.

*Susan B. Hackett*

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Susan B. Hackett  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 25<sup>th</sup> day of May, 2016.

*[Signature]*

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

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