

**ORIGINAL**

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Appeal from Orangeburg County

Kristi Lea Harrington, Circuit Court Judge

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**RECEIVED**

JUN 13 2016

**SC SUPREME COURT**

RONALD SMITH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002526

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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 Ronald Smith 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 Ronald Smith 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 the petition for writ of certiorari in the case of Timothy Young v. State with this Court on June 8, 2016. Counsel filed the petition for writ of certiorari in the case of Yorel Williams v. State with this Court on June 8, 2016. Counsel filed the petition for writ of certiorari in the case of Lorenzo D. Sullivan v. State with this Court on June 2, 2016. Counsel filed the petition for writ of certiorari in the case of Marvin Bowens Green v. State with this Court on May 16, 2016. Counsel filed the initial brief of appellant in the case of State v. Albert E. Siders with the Court of Appeals on May 13, 2016. Counsel filed the reply to return to re-petition for writ of certiorari in the case of Shannon McGee v. State with this Court on May 12, 2016. 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.

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.

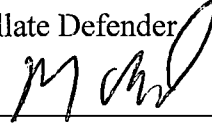
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon

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,



Laura R. Baer  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

Attorney for Petitioner

June 13, 2016

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Appeal from Orangeburg County

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RONALD SMITH,

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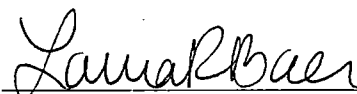
APPELLATE CASE NO. 2015-002526

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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 Clay Mitchell, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 13th day of June, 2016.



Laura R. Baer  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 13th day  
of June, 2016.



(L.S.)  
Notary Public for South Carolina

My Commission Expires: April 27, 2026.