

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Dorchester County

James E. Lockemy, Circuit Court Judge

RECEIVED

JUN 15 2016

SC SUPREME COURT

MARION BOWMAN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2012-213468

PETITION FOR EXTENSION TO FILE
THE BRIEF OF PETITIONER

The undersigned counsel respectfully requests a thirty day extension until July 15, 2016, in which to file the brief of petitioner in the above-referenced case. **Every effort will be made to file the brief of petitioner filed before the thirty-day deadline. This is a second extension request.** In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The brief of petitioner in this case is due to be served and filed today in this **death penalty case.**
2. Counsel argued the case of State v. Bryan Rearick in this Court today, June 15, 2016. On Monday, June 13, 2016 counsel filed a petition for writ of certiorari to the Court of Appeals in the case of State v. Ricky Eugene Passmore with this Court. On June 2, 2016, counsel

was co-counsel to Miles Edward Coleman on the initial reply brief of appellant filed in the case of State v. Hank Eric Hawes with the Court of Appeals. On May 27, 2016, counsel filed the initial brief of appellant in the case of State v. Jonathan Cody Newman with the Court of Appeals. On May 23, 2016 counsel, with co-counsel Lara M. Caudy, filed the petition for writ of certiorari in the Court of Appeals in the case of State v. Ryan Deleston with this Court. On May 11, 2016 counsel was co-counsel to Keir M. Weyble on the petition for writ of certiorari in the case of Sammie Louis Stokes v. State that was filed with the Supreme Court of the United States. On May 11, 2016, counsel was co-counsel to Appellate Defender Susan Hackett and Appellate Defender David Alexander on the petition for writ of certiorari to the Court of Appeals in the case of Brett D. Parker v. State that was filed 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. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training five less experienced appellate defenders and reading all of their writings.**

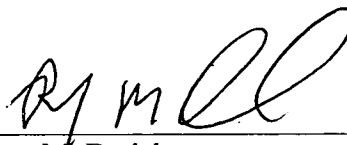
Co-counsel David Alexander filed the initial brief of appellant and designation of matter in the case of State v. Richard Tedford with the Court of Appeals on June 2, 2016. Counsel filed the brief of appellant and designation of matter in the case of State v. Robert Wazney with the Court of Appeals on May 25, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Robert T., a Juvenile Under the Age of Seventeen with the Court of Appeals on May 20, 2016. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Jeffrey Chapman before this Court on May 17, 2016. Together with co-counsel Robert M. Dudek and Susan Hackett, counsel filed a petition for writ of certiorari in the case of

State v. Brett Parker, in which the record exceeded 3,200 pages, with this Court on May 11, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jonathan Holder with the Court of Appeals on May 6, 2016. Counsel had an oral argument in the case of Jason Kinloch v. State before the Court of Appeals on May 2, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Joseph Cobb v. State with this Court on April 28, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of William Rice v. State with this Court on April 26, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Bobby Sims with the Court of Appeals on April 25, 2016. Counsel had an oral argument in the case of State v. Matthew Medley before the Court of Appeals on April 19, 2016. Along with co-counsel Chief Appellate Defender Robert M. Dudek, counsel had an oral argument in the death penalty case of State v. Ricky Blackwell before this Court on April 13, 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 thirty day extension until July 15, 2016. Counsel respectfully requests that the time limits for filing the brief of petitioner be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

June 15, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Dorchester County

James E. Lockemy, Circuit Court Judge

MARION BOWMAN,

PETITIONER,

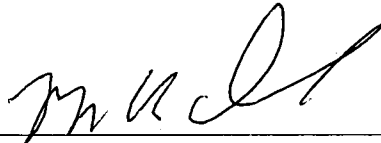
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

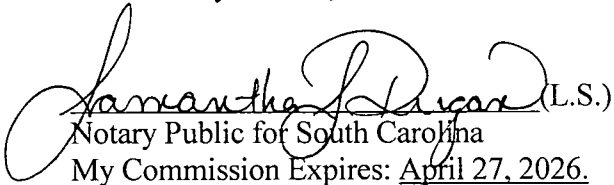
The undersigned attorney hereby certifies that a true copy of the petition for extension to file the brief of petitioner in the above referenced case has been served upon Alphonso Simon, Jr., Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 15th day of June, 2016.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 15th day of June, 2016.



(L.S.)
Notary Public for South Carolina
My Commission Expires: April 27, 2026.