

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Anderson County

R. Lawton McIntosh, Circuit Court Judge

RECEIVED

JUN 17 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 **final thirty day extension, until July 18, 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 argued the case of State v. Bryan Rearick in the Supreme Court Wednesday, June 15, 2016. On 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

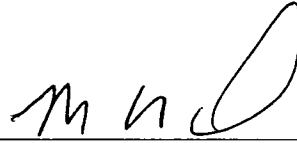
case of State v. Hank Eric Hawes with the Court of Appeals. On May 27, 2016, counsel filed the initial brief of appellant in the case of State v. Jonathan Cody Newman with the Court of Appeals. On May 23, 2016 counsel, with co-counsel Lara M. Caudy, filed the petition for writ of certiorari in the Court 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.**

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.

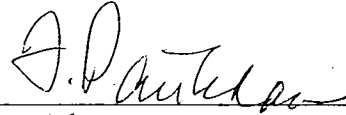
WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until July 18, 2016**, in which to file the petition for writ of certiorari and accompanying appendix. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Robert M. Dudek  
Chief Appellate Defender



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T. Patton Adams  
Executive Director  
J. Hugh Ryan, III  
General Counsel

June 17, 2016

I do not oppose:



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Patrick Schmeckpeper