

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Lexington County  
D. Craig Brown, Circuit Court Judge

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ORIGINAL  
**RECEIVED**  
JUL 01 2016  
**SC SUPREME COURT**

DENNIS SANDERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-002204

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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 appellant 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 appellant 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Gerald Barrett with the Supreme Court on June 28, 2016. Counsel 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 the Supreme 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 the Supreme 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 the Supreme Court on April 28, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of William Rice v. State with the Supreme 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.

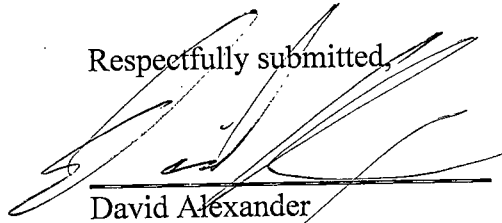
4. Counsel makes this request in good faith and not for purpose of delay.

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.

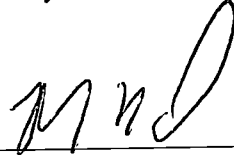
Respectfully submitted,



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David Alexander  
Appellate Defender

Attorney for Petitioner



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Robert M. Dudek  
Chief Appellate Defender

July 1, 2016

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Aiken County  
D. Craig Brown, Circuit Court Judge

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**SC SUPREME COURT**

DENNIS SANDERS,

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V.

STATE OF SOUTH CAROLINA,

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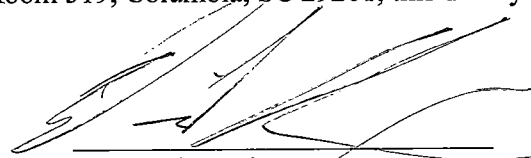
APPELLATE CASE NO. 2015-002204

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CERTIFICATE OF SERVICE

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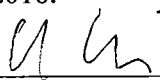
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Julie Coleman, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 1<sup>st</sup> day of July, 2016.



David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 1<sup>st</sup> day of  
July, 2016.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: May 12, 2025.