

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Pickens County
Honorable Perry H. Gravely, Circuit Court Judge

RECEIVED

AUG - 1 2016

SC SUPREME COURT

JOHNNY JAMES EDWARDS, JR.,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-000242 319

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for Johnny James Edwards, Jr. 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 Johnny James Edwards, Jr. 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 initial brief of appellant and designation of matter in the case of The State of South Carolina v. Robert Wilson on July 26, 2016 with the Supreme Court. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Willis Weary v. The State of South Carolina on July 25, 2016 with the Supreme Court. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David Vice v. The State of South Carolina on July 22, 2016 with the Supreme Court. Counsel filed a petition for rehearing in the case of Darryl Frierson v. The State of South Carolina on July 14, 2016 with this Court. Counsel filed a petition for rehearing in the case of The State of South Carolina v. William Anthony Wallace on July 14, 2016 with Court. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darrella Watson v. The State of South Carolina on July 8, 2016 with the Supreme Court. Counsel filed a petition for rehearing in the case of The State v. Marco Sanders on July 7, 2016 with this Court. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Demetrius Henderson on July 5, 2016 with this Court.

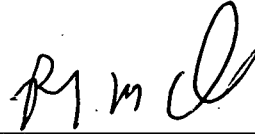
4. Counsel makes this request in good faith and not for purpose of delay.

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,

Lara M. Caudy for:
Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorneys for Petitioner

August 1, 2016

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IN THE SUPREME COURT

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V.

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 Patrick Schmeckpeper, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 1st day of August, 2016.

Loralee M. Caudy for:
Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 1st day
of August, 2016.

Maria Meadows (L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.