

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Florence County

Edgar W. Dickson, Circuit Court Judge  
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**ORIGINAL**

**RECEIVED**

AUG - 4 2016

**SC SUPREME COURT**

VERNELL W. HARRIS,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

Appellate Case No. 2015-002082  
\_\_\_\_\_

PETITION FOR EXTENSION TO FILE THE  
RETURN TO THE PETITION FOR WRIT OF CERTIORARI  
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The undersigned counsel respectfully requests a **final thirty day extension, until September 6, 2016**, in which to file the return to the petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The return to the petition for writ of certiorari in this case is due to be served and filed today.
2. On July 26, 2016, counsel filed the initial brief of appellant in the case of State v. Devarous S.L. Parks with the Court of Appeals. On July 18, 2016 counsel filed the petition for writ of certiorari in the case of Melody Holmes v State with the Supreme Court. On July 8, 2016,

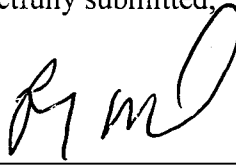
counsel filed the initial brief of appellant in the case of State v. Walter Scott Garrett with the Court of Appeals. On June 23, 2016 counsel filed the petition for rehearing in the case of State v. James Cross with the Court of Appeals. On June 15, 2016 counsel argued the case of State v. Bryan Rearick in this Court. On June 13, 2016 counsel filed the 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. **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 her 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.

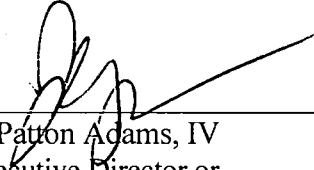
WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until September 6, 2016**. Counsel respectfully requests that the time limits for filing the return to the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Robert M. Dudek  
Chief Appellate Defender

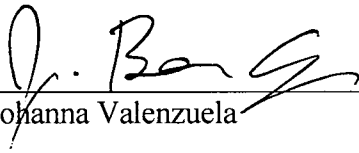


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T. Patton Adams, IV  
Executive Director or  
J. Hugh Ryan, III  
General Counsel

August 4, 2016

I do not oppose:

  
for Johanna Valenzuela