

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

 ORIGINAL

Appeal from Lexington County

Honorable William Jeffrey Young, Circuit Court Judge

**RECEIVED**

AUG 18 2016

**SC SUPREME COURT**

ALEXANDER LYNCH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-000516

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

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.

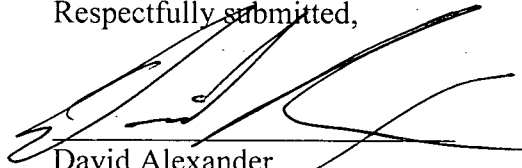
3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Filiberto Campos with the Court of Appeals on August 17, 2016. Counsel filed a petition for rehearing in the case of Darrell L. Goss v. State with the Court of Appeals on August 10, 2016. Along with co-counsel Chief Appellate Defender Robert M. Dudek, counsel filed the brief of petitioner in the death penalty case of Marion Bowman v. State with this Court on August 8, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Juan Smith with the Court of Appeals on August 8, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Heyward Truesdale v. State with this Court on August 5, 2016. Counsel filed the Anders brief of appellant and Record on Appeal in the case of State v. Christopher Allen Middleton with the Court of Appeals on August 4, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Daniel Lee Lard with the Court of Appeals on July 13, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of State v. Michael Carter with this Court on June 30, 2016. Counsel filed petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Gerald Barrett with this Court on June 28, 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.

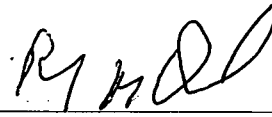
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'DAVID ALEXANDER', written over a horizontal line.

David Alexander  
Appellate Defender

Attorney for Petitioner

A handwritten signature in black ink, appearing to read 'R. M. DUDEK', written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

August 18, 2016

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Appeal from Lexington County

Honorable William Jeffrey Young, Circuit Court Judge

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ALEXANDER LYNCH,

PETITIONER,

V.

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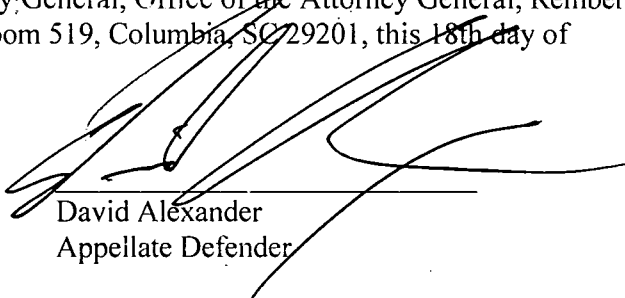
APPELLATE CASE NO. 2016-000516

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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 Patrick Schmeckpeper, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 18th day of August, 2016.




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David Alexander  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 18th day  
of August, 2016.



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(L.S.)

Notary Public for South Carolina

My Commission Expires: October 30, 2022.