

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
Honorable Larry B. Hyman, Circuit Court Judge

RECEIVED

AUG 24 2016

SC SUPREME COURT

SAMA CHAKA QUINLAND,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2016-000693

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

Counsel for Sama Chaka Quinland 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:

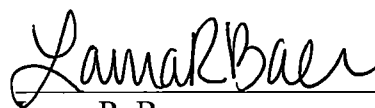
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Sama Chaka Quinland respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously 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 brief of respondent in the case of Norman Hayes v. State with this Court on August 17, 2016. Counsel filed the petition for writ of certiorari in the case of

Ronald Smith v. State with this Court on August 12, 2016. Counsel filed the petition for writ of certiorari in the case of Antwine Matthews v. State with this Court on August 12, 2016. Counsel filed the initial brief of appellant in the case of State v. Dean Distasio with the Court of Appeals on August 8, 2016. Counsel filed the initial brief of respondent in the case of State v. Josie Jones with the Court of Appeals on July 22, 2016. Counsel filed the initial brief of appellant in the case of State v. Darren Keith Belt with the Court of Appeals on July 15, 2016. Counsel filed the petition for writ of certiorari in the case of Derrick Harriott v. State with this Court on July 5, 2016. Counsel filed the initial brief of appellant in the case of State v. Justin Cameron Harden with the Court of Appeals on June 24, 2016.

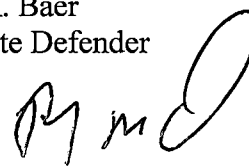
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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,



Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

August 24, 2016

Attorney for Petitioner

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
Honorable Larry B. Hyman, Circuit Court Judge

SAMA CHAKA QUINLAND,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

CERTIFICATE OF SERVICE

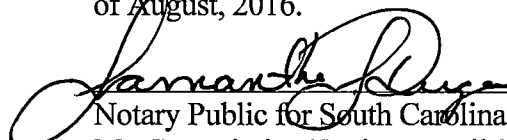
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Alicia Olive, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 24th day of August, 2016.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 24th day
of August, 2016.



(L.S.)
Notary Public for South Carolina
My Commission Expires: April 27, 2026.