

**ORIGINAL**

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Greenville County

Perry H. Gravely, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

**AUG 31 2016**

**S.C. SUPREME COURT**

RENE MIGUEL RODRIGUEZ,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-000410  
\_\_\_\_\_

**PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI  
AND APPENDIX**  
\_\_\_\_\_

The undersigned counsel would respectfully request a thirty-day extension in which to file the petition for writ of certiorari and appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following exigent circumstances:

1. The petition for writ of certiorari and appendix in this case are due to be served and filed today, having been extended by one prior order of this Court.
2. Counsel filed the Initial Brief of Appellant in the case of The State of South Carolina v. Leo Abney in the Court of Appeals on August 19, 2016. Counsel filed the

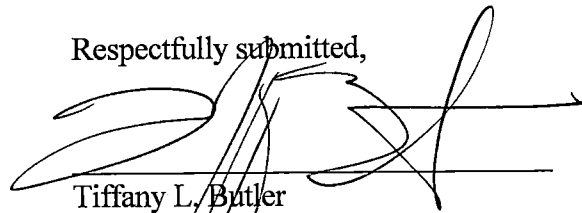
Petition for Writ of Certiorari and the accompanying appendix in the case of Rahiem Kirkman v. The State of South Carolina in this Court on August 17, 2016. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Johnnie Frazier v. The State of South Carolina in this Court on August 10, 2016. Counsel filed the Anders Brief of Appellant and Record on Appeal in the case of The State v. Thomas Marett in the Court of Appeals on August 4, 2016. Counsel filed the Initial Brief of Appellant in the case of The State of South Carolina v. Sterling Maybin in the Court of Appeals on July 27, 2016. Counsel Filed the Anders Brief of Appellant, Designation of Matter and Record on Appeal in the case of The State v. Kalven T. Pearson in this Court on July 22, 2016. Counsel filed the Johnson Petition for Writ of Certiorari and the accompanying appendix in the case of Christopher Doville v. The State of South Carolina in this Court on July 18, 2016. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of David Onley v. The State of South Carolina in this Court on July 13, 2016. Counsel filed the Petition for Writ of Certiorari in the case of Dyzshon Boykins v. The State of South Carolina in this Court on July 11, 2016. Counsel filed the Anders Brief of Appellant Pursuant to White v. State, the Petition for Writ of Certiorari and accompanying appendix in the case of Joshua Monroe v. State of South Carolina in this Court on July 5, 2016. Counsel filed the Brief of Appellant in the case of The State of South Carolina v. Vincent Missouri in the Court of Appeals on July 5, 2016. Counsel filed the Return to Petition for Writ of Certiorari in the case of Dyshon R. Boykins v. The State of South Carolina in this Court on June 23, 2016. Counsel filed the Final Brief of Appellant in the case of The State of South Carolina v. Edward R. Anthony in the Court of Appeals on June 20, 2016. Counsel

filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Phillip Joseph Stegall in the Court of Appeals on June 15, 2016.

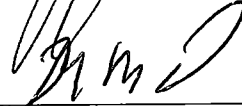
3. This request is made in good faith, and not for purposes of delay.

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. Counsel requests that the time limits for filing the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'T. Butler', written over a horizontal line.

Tiffany L. Butler  
Appellate Defender

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

Robert M. Dudek  
Chief Appellate Defender

August 31, 2016

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Greenville County

Perry H. Gravely Circuit Court Judge

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RENE MIGUEL RODRIGUEZ,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

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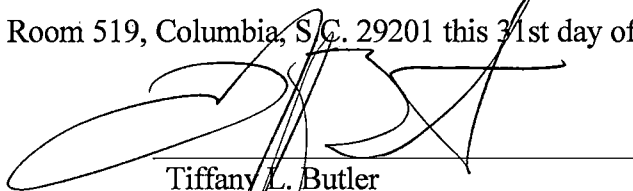
APPELLATE CASE NO. 2016-000410

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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 Karen C. Ratigan, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, S.C. 29201 this 31st day of August, 2016.



Tiffany L. Butler  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
This 31st day of August, 2016.

Christian Ford (L.S.)

Notary Public for South Carolina

My Commission Expires: March 1, 2026.