

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
Honorable William Jeffrey Young, Circuit Court Judge

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ALEXANDER LYNCH,

S.C. SUPREME COURT

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 Alexander Lynch respectfully requests a **final thirty (30) day extension, until October 19, 2016**, 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 third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Alexander Lynch 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.

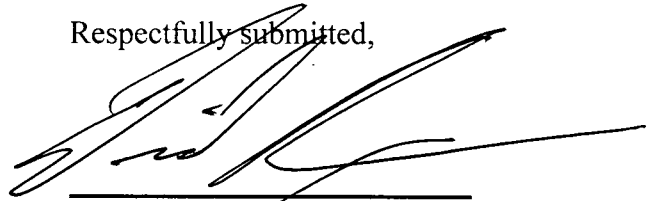
3. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Timothy Groves Oxendine with the Court of Appeals on September 14, 2016. Counsel had an oral argument in the case of State v. Corey Jamal Williams before the Court of Appeals on September 8, 2016. Counsel had an oral argument in the case of State v. Jimmy Turner before the Court of Appeals on September 7, 2016. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Dennis F. Sanders v. State with the Supreme Court on September 6, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jeramy Parks with the Court of Appeals on August 24, 2016. Counsel filed the reply brief of petitioner in the case of Randall S. Tyler v. State in the Supreme Court on August 18, 2016. 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 the Supreme 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 the Supreme 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.

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

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

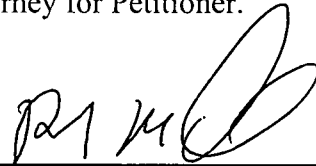
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until October 19, 2016**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander
Appellate Defender

Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 19th day of September, 2016.

I consent:



Patrick Schmeckpeper, Esquire