

**ORIGINAL**

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Sumter County

William Jeffrey Young, Circuit Court Judge  
\_\_\_\_\_

Opinion No. 5408 (S.C. Ct. App. filed 06/08/16)

09-Cp-43-2055  
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**RECEIVED**

SEP 21 2016

MARTINA R. PUTNAM,

S.C. SUPREME COURT  
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-001922  
\_\_\_\_\_

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

Counsel for Martina R. Putnam respectfully requests an extension of five (5) days in which to file the petition for writ of certiorari to the Court of Appeals 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 to the Court of Appeals and appendix are due to be served and filed with the Court today.

2. Counsel for Ms. Putnam 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 initial brief of appellant in the case of In the Matter of Care and Treatment of Roy Lee Wade with the Court of Appeals on September 16, 2016. Counsel filed the initial reply brief of appellant in the case of State v. Albert E. Siders with the Court of Appeals on September 6, 2016. Counsel filed the reply to return to petition for writ of certiorari in the case of Sheldon Oakman v. State with this Court on August 25, 2016. 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.

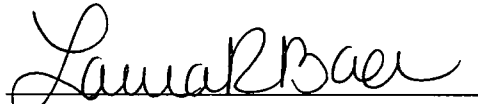
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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

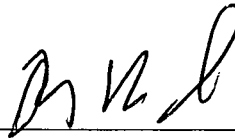
6. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request an additional extension of five (5) days in which to file the petition for writ of certiorari and that the time be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Laura R. Baer  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

September 21, 2016

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Sumter County  
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MARTINA R. PUTNAM,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

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CERTIFICATE OF SERVICE

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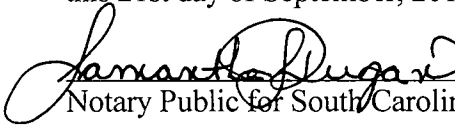
The undersigned attorney hereby certifies that a true copy of the petition for extension in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Julie Coleman, Esquire, Assistant General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Rm. 519, Columbia, SC 29201, and the S.C. Court of Appeals this 21<sup>st</sup> day of September, 2016.



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Laura R. Baer  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 21st day of September, 2016.

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