



STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Horry County
Honorable Thomas A. Russo, Circuit Court Judge

ANCEL RAMON HARRIS,

V.

STATE OF SOUTH CAROLINA,

 ORIGINAL
 RECEIVED
SEP 22 2016
PETITIONER, SUPREME COURT

RESPONDENT

APPELLATE CASE NO. 2016-000486

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

Counsel for Ancel Ramon Harris 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 Ancel Ramon Harris 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 had an oral argument in the case of The State v. Fred Jack Sanders before the Court of Appeals on September 22, 2016. Counsel filed initial brief of appellant and designation of matter in the case of State v. Keyon Robinson in the Court of Appeals on September 14, 2016. Counsel filed petition for writ of certiorari and the accompanying petition for writ of certiorari pursuant to Austin v. State and accompanying appendix in the case of Michael Ray Elders v. State in this Court on September 6, 2016. Counsel filed petition for rehearing in the case of State v. Arthur Moseley in the Court of Appeals on September 2, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Shanita Cunningham v. State in this Court on August 31, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Christopher Lee Johnson v. State in this Court on August 22, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix along with Anders brief of appellant pursuant to White v. State in the case of Charlton L. Hill v. State in this Court on August 17, 2016. Counsel filed initial brief of appellant and designation of matter in the case of State v. Jerry L. Gardner, Jr. in the Court of Appeals on August 3, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Vincent Rice v. State in this Court on August 3, 2016. Counsel filed petition for writ of certiorari and the accompanying appendix in the case of Termain Cooper v. State in this Court on July 26, 2016.

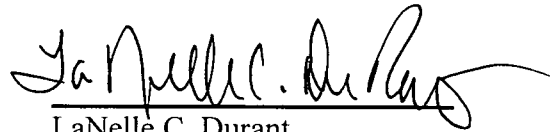
4. Counsel makes this request in good faith and not for purpose of delay.

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

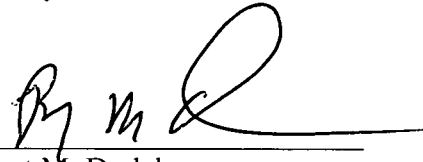
the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



LaNelle C. Durant
Appellate Defender

Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

September 22, 2016

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IN THE SUPREME COURT

Certiorari to Horry County
Honorable Thomas A. Russo, Circuit Court Judge

ANCEL RAMON HARRIS,

PETITIONER,

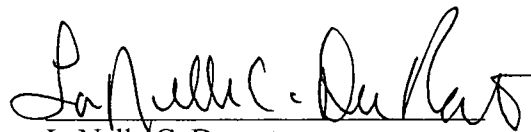
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

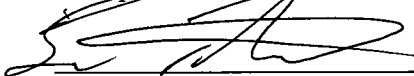
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Caitlin Hastings, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 22nd day of September, 2016.



LaNelle C. Durant
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 22nd day
of September, 2016.

 (L.S.)

Notary Public for South Carolina
My Commission Expires: October 30, 2022.