

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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ORIGINAL

Appeal from Charleston County  
Honorable Deadra L. Jefferson, Circuit Court Judge

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RECEIVED

VASHAWN RAVENEL,

OCT 17 2016

PETITIONERS SUPREME COURT

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-001051

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

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Counsel for Washawn Ravenel respectfully requests a **final thirty (30) day extension, until November 16, 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 Washawn Ravenel respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. **Counsel is being treated for a chronic health condition which has severely limited his working hours.** 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.

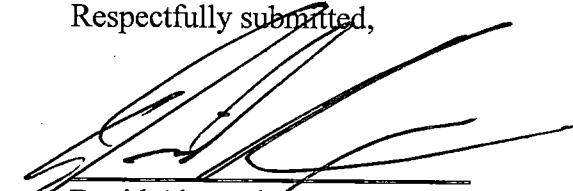
3. Counsel had an oral argument in the case of State v. Dominique Lavar Williams before the Court of Appeals on October 12, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Rodney M. Alexander with the Court of Appeals on September 30, 2016. On September 22, 2016, counsel argued motions before the PCR court in Spartanburg, South Carolina, pursuant to the Supreme Court's remand Order in the death penalty case of Marion Alexander Lindsay v. State. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Martin Rodriguez with the Court of Appeals on September 19, 2016. 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 this 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 this 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.

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.

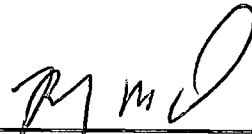
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until November 16, 2016**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander  
Appellate Defender

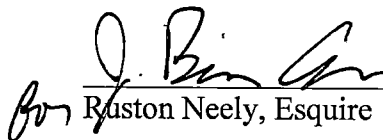
Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 17th day of October, 2016.

I consent:

  
Ruston Neely, Esquire