

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Charleston County

Deadra L. Jefferson, Circuit Court Judge

RECEIVED

OCT 17 2016

S.C. SUPREME COURT

FREDERICK FLOWERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2016-001174

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a **final thirty day extension, until November 16, 2016**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the Johnson Petition for Writ of Certiorari and accompanying appendix in the case of Gregory Pencille v. The State of South Carolina in this Court on October 14, 2016. Counsel filed the Anders Brief of Appellant, Designation of Matter, and Record on Appeal

in the case of The State v. Rasheed T. Glover in the Court of Appeals on October 10, 2016. Counsel filed the Johnson Petition for Writ of Certiorari and the accompanying appendix in the case of Johnny James Edwards, Jr v. The State of South Carolina with this Court on September 30, 2016. Counsel filed the Anders Brief of Appellant and record on appeal in the case of The State of South Carolina v. Randy Glenn in the Court of Appeals on September 28, 2016. Counsel filed the Petition for Writ of Certiorari and the accompanying appendix in the case of The State of South Carolina v. William Anthony Wallace in this Court on September 19, 2016. Counsel filed the Petition for Writ of Certiorari and the accompanying appendix in the case of The State of South Carolina v. Marco Sanders in this Court on September 19, 2016. Counsel filed the Petition for Writ of Certiorari and the accompanying appendix in the case of Darryl Frierson v. The State of South Carolina in this Court on September 19, 2016. Counsel filed the petition for writ of certiorari and the accompanying appendix Tommie L. Pixley v. The State of South Carolina with this Court on September 12, 2016. Counsel filed the Johnson petition for writ of certiorari and the accompanying appendix in the case of Oblin Banegas Maldonado v. The State of South Carolina with this Court on September 9, 2016. Counsel filed the reply to return to petition for writ of certiorari in the case of Clark D. Thomas v. The State of South Carolina with this Court on September 8, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Roosevelt Anthony Reaves v. The State of South Carolina with this Court on September 7, 2016. Counsel filed a motion in opposition in the case of Willis Weary v. The State of South Carolina on September 2, 2016, with this Court.

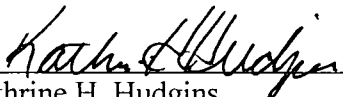
3. As indicated by his consent below, counsel for the state does not oppose this request.

4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will

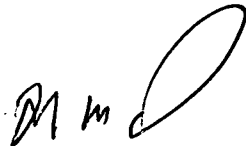
hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until November 16, 2016**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



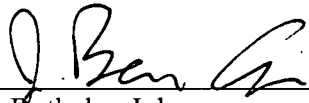
Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

October 17, 2016

I do not oppose:

for 

J. Rutledge Johnson