

 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable R. Keith Kelly, Circuit Court Judge

CHAD HOLLINGSWORTH,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2016-001053

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

RECEIVED

OCT 18 2016

S.C. SUPREME COURT

Counsel for Chad Hollingsworth 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 Chad Hollingsworth 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.

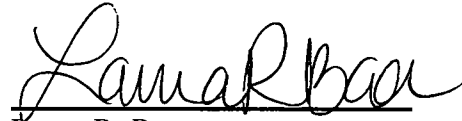
3. Counsel will file the reply to return to petition for writ of certiorari in the case of Marvin Bowens Green v. State with this Court today, October 17, 2016. Counsel will file the initial brief of appellant in the case of State v. Stacy Riden with the Court of Appeals today, October 17, 2016. Counsel will file the initial brief of appellant in the case of State v. Billy Phillips with the Court of Appeals today, October 17, 2016. Counsel filed the initial brief of appellant in the case of In the Interest of: Malik S., A Minor Under the Age of Seventeen with the Court of Appeals on September 30, 2016. Counsel filed the initial brief of appellant in the case of State v. Johnnie Lee Lawson with the Court of Appeals on September 30, 2016. 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.

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

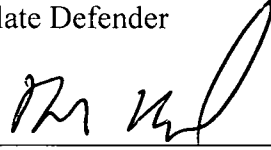
5. Counsel for the Attorney General's office has been informed of this request.

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,

A handwritten signature in cursive script, appearing to read "Laura R. Baer".

Laura R. Baer
Appellate Defender

A handwritten signature in cursive script, appearing to read "R. M. Dudek".

Robert M. Dudek
Chief Appellate Defender

October 17, 2016

Attorney for Petitioner

