

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

RECEIVED

OCT 31 2016

S.C. SUPREME COURT

LEONARD B. GOODWIN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-001173

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

Counsel for Leonard B. Goodwin respectfully requests an extension of thirty (30) days in which to file the 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 writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Leonard B. Goodwin 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.

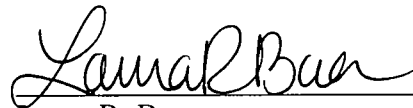
3. Counsel filed the initial brief of appellant in the case of State v. Timothy Wayne Johnson with the Court of Appeals on October 26, 2016. Counsel filed the petition for writ of certiorari in the case of David Dwight Smith v. State with this Court on October 26, 2016. Counsel filed the petition for writ of certiorari in the case of Sama Chaka Quinland v. State with this Court on October 21, 2016. Counsel filed the reply to return to petition for writ of certiorari in the case of Marvin Bowens Green v. State with this Court on October 17, 2016. Counsel filed the initial brief of appellant in the case of State v. Stacy Riden with the Court of Appeals on October 17, 2016. Counsel filed the initial brief of appellant in the case of State v. Billy Phillips with the Court of Appeals on October 17, 2016.

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

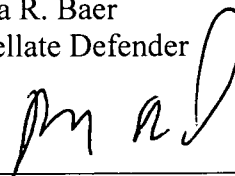
5. Counsel for the Attorney General's office has been informed of this request.

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

Respectfully submitted,



Laura R. Baer
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This October 31, 2016.

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IN THE SUPREME COURT

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LEONARD B. GOODWIN,

PETITIONER


V.

STATE OF SOUTH CAROLINA,

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CERTIFICATE OF SERVICE


I certify that a copy of the Motion for an Extension of Time in which to file the writ of certiorari and appendix in the above referenced case has been served upon J. Rutledge Johnson, Esquire, at the Office of the Attorney General, this 31st day of October, 2016.



Laura R. Baer
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this October 31, 2016.



(L.S.)
Notary Public for South Carolina

My Commission Expires: October 20, 2022.