

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Richland County

Honorable G. Thomas Cooper, Circuit Court Judge

TYRIS B. GLOVER,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-000900

RECEIVED

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S.C. SUPREME COURT

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

The undersigned counsel respectfully requests a thirty day extension, **until December 12, 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 petition for rehearing in the case of The State v. Daniel Martinez Herrera with the Court of Appeals on October 27, 2016. Counsel filed the reply brief pursuant to

White v. State in the case of Daniel Hamrick v. The State of South Carolina in the Supreme Court on October 27, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Deitrich Funchess v. The State of South Carolina in the Supreme Court on October 26, 2016. Counsel attended a reconstruction hearing in the case of The State v. Joe Ross Worley on October 25, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Brandon Jermaine Benson with the Court of Appeals on October 17, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Alan Massey with the Court of Appeals on October 17, 2016. Counsel had an oral argument in the case of The State v. Alexander Carmichael Huckabee III in the Court of Appeals October 12, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jacqueline Mesidor with the Court of Appeals on September 30, 2016. Counsel filed the motion to hold appeal in abeyance and motion to remand for reconstruction of the record in the case of The State v. Terry McCall with the Court of Appeals on September 30, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tommy McKnight v. The State of South Carolina in the Supreme Court on September 28, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antwine Matthews v. The State of South Carolina in the Supreme Court on September 26, 2016.

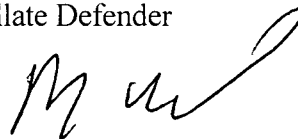
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. 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,

A handwritten signature in black ink, appearing to read "John H. Strom", written over a horizontal line.

John H. Strom
Appellate Defender

A handwritten signature in black ink, appearing to read "Robert M. Dudek", written over a horizontal line.

Robert M. Dudek
Chief Appellate Defender

November 10, 2016

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IN THE SUPREME COURT

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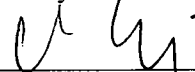
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Jessica Kinard, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 10th day of November, 2016.


John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 10th day of November, 2016.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12th, 2025.