

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

RECEIVED

DEC -1 2016

LEONARD B. GOODWIN,

S.C. SUPREME COURT

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-001173

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

Counsel for Leonard B. Goodwin respectfully requests a **final thirty (30) day extension, until January 3, 2017**, 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 served and filed with the Court today. The Court has granted counsel two previous extensions.
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.

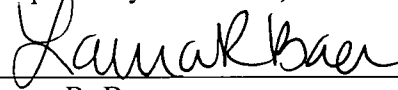
3. Counsel filed the petition for writ of certiorari in the case of Roshod Baker v. the State with the Supreme Court on November 23, 2016. Counsel filed the initial brief of appellant in the case of State v. David Alan White with the Court of Appeals on November 21, 2016. Counsel filed the initial brief 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 the Supreme Court on October 26, 2016. Counsel filed the petition for writ of certiorari in the case of Sama Chaka Quinland v. State with the Supreme Court on October 21, 2016. Counsel had oral argument in the case of Norman Hayes v. State with the Supreme Court on October 20, 2016. Counsel filed the reply to return to petition for writ of certiorari in the case of Marvin Bowens Green v. State with the Supreme 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.

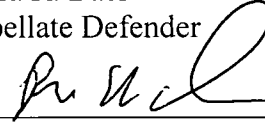
5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until January 3, 2017**, 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 for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

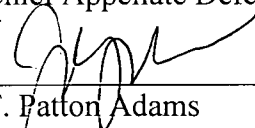
Respectfully submitted,



Laura R. Baer
Appellate Defender



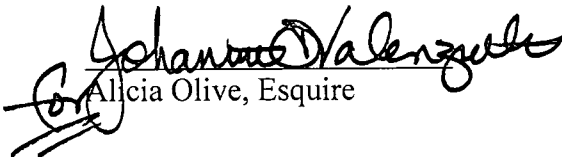
Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director/
J. Hugh Ryan, III
General Counsel/
W. Lawrence Brown
Deputy General Counsel

This 1st day of December, 2016.

I consent:



Alicia Olive, Esquire