

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County
Honorable Brooks P. Goldsmith, Circuit Court Judge

RECEIVED

DEC 16 2016

JOEL ROBINSON,

S.C. SUPREME COURT
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2016-000575

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

Counsel for Joel Robinson respectfully requests a **final thirty (30) day extension, until January 16, 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 filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Joel Robinson 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Maurice Marshall Harris with the Court of Appeals on December 13, 2016. Counsel filed the return to petition for writ of certiorari in the case of State v. Jimmy Turner with this Court on December 8, 2016. Counsel had an oral argument in the case of State v. Tyrone D. Ellison before the Court of Appeals on December 7, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Matthew Dwyer with the Court of Appeals on December 2, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Billy Ray Smith with the Court of Appeals on November 28, 2016. Counsel filed a petition for rehearing in the case of State v. James Kevin Bethal with the Court of Appeals on November 23, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Terry Catoe with the Court of Appeals on November 16, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Leonard Jenkins with the Court of Appeals on November 16, 2016. Counsel filed the petition for writ of certiorari in the case of Vashawn Ravenel v. State with this Court on November 14, 2016. Counsel filed the petition for writ of certiorari in the case of Darrell L. Goss v. State with this Court on November 14, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. King Chevais Conyers with this Court of Appeals on November 9, 2016. Counsel filed the petition for rehearing in the case of Corey Jamal Williams v. State with the Court of Appeals on November 2, 2016. Counsel filed the reply brief of appellant in the case of State v. Vincent Missouri with the Court of Appeals on October 28, 2016. Along with co-counsel Chief Appellate Defender Robert M. Dudek and Appellate Defender Lara M. Caudy, counsel filed the Post – Hearing Supplemental Memorandum in the case of Marion Alexander Lindsey v. State with the Court of Common Pleas Seventh Judicial Circuit on October 21, 2016. Counsel filed the

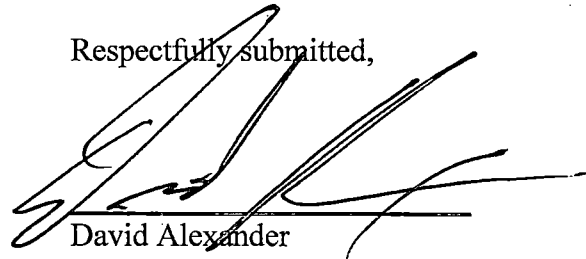
petition for writ of certiorari and accompanying appendix as well as the petition for writ of certiorari pursuant to Austin v. State in the case of Alexander Lynch v. State in this Court on October 19, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jason Morton 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 consents to this request as shown by signature below.

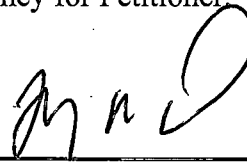
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until January 16, 2017**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander
Appellate Defender


Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 16th day of December, 2016.

I consent:



Jessica Kinard, Esquire