

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Dorchester County
James E. Lockemy, Circuit Court Judge

RECEIVED

JAN 19 2017

PETITIONER,
S.C. SUPREME COURT

MARION BOWMAN,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2012-213468

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE REPLY BRIEF

Counsel for Marion Bowman respectfully requests a **final extension of ten (10) days until January 30, 2017**, in which to file the reply brief in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. In support of this request, counsel shows:

1. The reply brief is due to be served and filed with the Court today.
2. Counsel for Marion Bowman 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 is currently doing research on legal issues involved in the upcoming Aiken v. Byers juvenile resentencing hearings for a comprehensive presentation. On January 18, 2017,

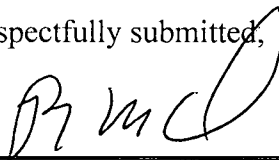
counsel had an oral argument in the case of The State v. Robert L. Moore before the Court of Appeals. On January 3, 2017, counsel filed the brief of petitioner in the case of The State v. Ryan P. Deleston with this Court. On December 30, 2016, counsel filed the petition for writ of certiorari in the double jeopardy case of The State v. Bryan Rearick with the United States Supreme Court. On December 19, 2016, counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Thomas James with this Court. On December 9, 2016, counsel filed the brief of petitioner in the case of The State v. Harold Bennon Cartwright, III, with this Court. On December 1, 2016, counsel, along with co-counsel, Lara M. Caudy, filed the reply to the return to the petition for writ of certiorari in the death penalty case of Anthony Woods v. The State of South Carolina with this Court. On November 21, 2016, counsel filed the brief in opposition to the petition for writ of certiorari in the case of The State of South Carolina v. Antonio Miller with the United States Supreme Court. On November 10, 2016, counsel was co-counsel on the initial reply brief of appellant that was filed in the death penalty case of The State v. Luzenski Cottrell with this Court. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and, training four less experienced appellate defenders and reading all of their writings.**

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 ten (10) day extension until January 30, 2017**, in which to file the reply brief in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the brief be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Robert M. Dudek
Chief Appellate Defender

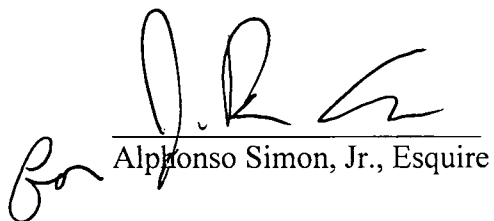
Attorney for Petitioner



T. Patton Adams
Executive Director/
J. Hugh Ryan, III
General Counsel

This 19th day of January, 2017.

I consent:



Alphonso Simon, Jr., Esquire