

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

ORIGINAL

Appeal from Richland County

Honorable G. Thomas Cooper, Circuit Court Judge

RECEIVED

FEB 13 2017

ERIVA YOUMOUS,

S.C. SUPREME COURT  
PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-001889

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

The undersigned counsel respectfully requests a thirty day extension, **until March 15, 2017**, 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 initial brief of appellant and designation of matter in the case of The State v. Timothy Emmanuel Greene with the Court of Appeals on February 8, 2017. Counsel

filed the petition for writ of certiorari and accompanying appendix in the case of Frank Middleton v. State of South Carolina with the Supreme Court on January 27, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Joseph Manners with the Court of Appeals on January 18, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Tinsley v. State of South Carolina with the Supreme Court on January 11, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Terry Cooper with the Court of Appeals on January 6, 2017.

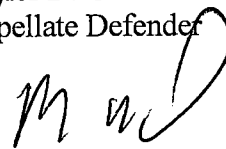
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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,



Taylor D. Gilliam  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

February 13, 2017

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Richland County

Honorable G. Thomas Cooper, Circuit Court Judge

ERIVA YOUMOUS,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

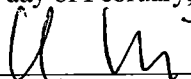
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Jessica Kinard, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 13<sup>th</sup> day of February, 2017.



Taylor D. Gilliam  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 13<sup>th</sup> day of February, 2017.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: May 12<sup>th</sup>, 2025.