

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Appeal from York County
Frank R. Addy, Circuit Court Judge

RECEIVED

FEB 13 2017

JOSHUA BROOKINS,

PETITIONER
S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-001592

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

Counsel for Joshua Kenneth Brookins respectfully requests a **final thirty (30) day extension, until March 15, 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 Joshua Kenneth Brookins 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 is filing the petition for rehearing in State v. Stephon Robinson with the Court of Appeals today, February 13, 2017. Counsel also intends to file the petition for writ of certiorari in William Patrick Deaton v. State with this Court today, February 13, 2017. Counsel filed the brief of petitioner in the case of Alonda B. Desaussure v. State with this Court on February 7, 2017. Counsel filed the petition for rehearing in the case of State v. David Glover with the Court of Appeals on January 24, 2017. Counsel filed the petition for writ of certiorari in the case of Boyd Rashaen Evans v. State with this Court on January 20, 2017. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Calvin Terrell Williams with the Court of Appeals on January 18, 2017. Counsel filed the initial reply brief of appellant in the case of State v. Dean Distasio with the Court of Appeals on January 12, 2017. Counsel filed the initial brief of appellant in the case of State v. Preston Mozeak with the Court of Appeals on January 11, 2017. Counsel filed the initial brief of appellant in the case of State v. Richard A. Capell with the Court of Appeals on January 9, 2017. Counsel filed the initial brief of appellant in the case of State v. John Calvin Sledge with the Court of Appeals on January 9, 2017. Counsel filed the Johnson petition for writ of certiorari in the case of Leonard B. Goodwin v. State with this Court on January 3, 2017.

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.

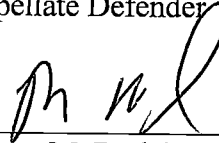
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 15, 2017**, in which to file the Petition for Writ of Certiorari and

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.

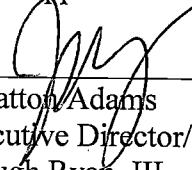
Respectfully submitted,



Laura R. Baer
Appellate Defender



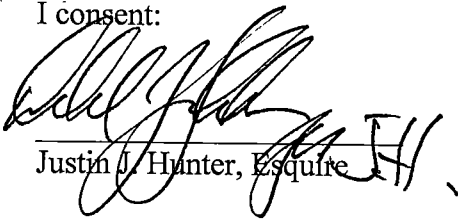
Robert M. Dudek
Chief Appellate Defender



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

This 10th day of February, 2017.

I consent:



Justin J. Hunter, Esquire