

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Pickens County
Honorable Edward W. Miller, Circuit Court Judge

RECEIVED

FEB 16 2017

JOSEPH P. SANDERS, IV,

S.C. SUPREME COURT
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2016-001795

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

Counsel for Joseph P. Sanders, IV, respectfully requests a **final thirty (30) day extension, until March 20, 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 Joseph P. Sanders, IV, 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.

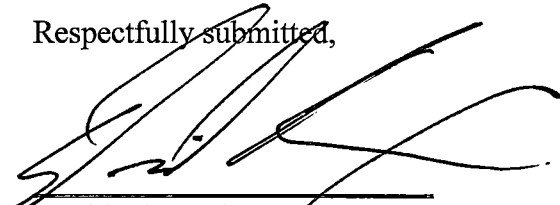
3. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Michael Kaminski with the Court of Appeals on February 8, 2017. Counsel filed the petition for writ of certiorari in the case of State v. James K. Bethel with this Court on February 6, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of Joshua B. Phillips v. State with this Court on February 1, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Adrian Jenkins with the Court of Appeals on January 27, 2017. Counsel filed the petition for rehearing in the case of In The Matter and the Care of Daryl T. Snow with the Court of Appeals on January 26, 2017. Counsel filed the initial brief of respondent and designation of matter in the case of State v. John Kenneth Massey, Jr. with the Court of Appeals on January 26, 2017. Counsel filed the petition for writ of certiorari in the case of Shaquan Thompson v. State with this Court on January 19, 2017. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of State v. Corey Jamal Williams with this Court on January 18, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Cheo D. Green with the Court of Appeals on January 17, 2017. Counsel filed the petition for writ of certiorari in the case of Joel Robinson v. State with this Court on January 13, 2017. Counsel filed the brief of petitioner in the case of State v. James Allen Johnson with this Court on January 3, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Jason Bodie with the Court of Appeals on December 28, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Cleveland Edward Young with the Court of Appeals on December 16, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Brandon Hunter Kenny Rivers with the Court of Appeals on December 16, 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 March 20, 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

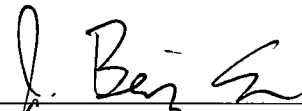
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 16th day of February, 2017.

I consent:

for 
Justin J. Hunter, Esquire