

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Appeal from Florence County

Honorable Jocelyn J. Newman, Circuit Court Judge

RECEIVED

APR 03 2017

THOMAS ELBERT VANHOOSE,

S.C. SUPREME COURT
PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-001602

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

Counsel respectfully requests a **final extension of thirty (30) days until May 3, 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 is due to be served and filed with the Court today.
2. Counsel 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 petition for writ of certiorari and accompanying appendix in the case of Matthew Frazier v. State of South Carolina with the Supreme Court on March 23, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jarvis Hughes with the Court of Appeals on March 15, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Stapleton v. State of South Carolina with the Supreme Court on March 13, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dean Henry Cole v. State of South Carolina with the Supreme Court on March 10, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Cathy Dawn Skates with the Court of Appeals on March 1, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kalvin Brown with the Court of Appeals on February 27, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Chuck Edward McCullough v. State of South Carolina with the Supreme Court on February 21, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Arturo Rios Torres with the Court of Appeals on February 16, 2017. 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.

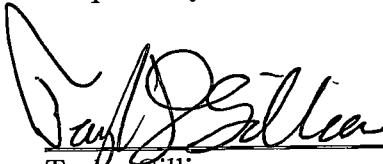
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

will hopefully become more manageable in the near future, and less extensions will need to be requested.

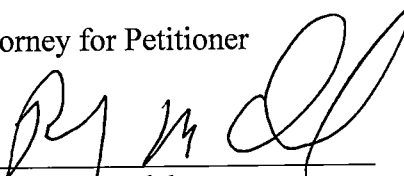
5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until May 3, 2017**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,

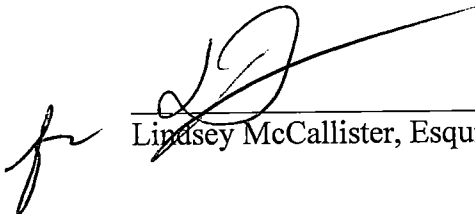

Taylor Gilliam
Appellate Defender

Attorney for Petitioner


Robert M. Dudek
Chief Appellate Defender

This 3rd day of April, 2017

I Consent:


Lindsey McCallister, Esquire