

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Beaufort County

Honorable Perry M. Buckner, Circuit Court Judge

RECEIVED

MAY 08 2017

ALFONZO J. HOWARD,

PETITIONER,
S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2016-002269

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

The undersigned counsel respectfully requests a **final thirty (30) day extension, until June 7, 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 prepared the preserving the record for appeal exercises and a power point on Rules of Evidence Issues and Error Preservation for the three day Public Defense 103 training from May 1-3, 2017, in Greenville, South Carolina where he serves on the faculty. Counsel is

preparing the initial brief of appellant and designation of matter in the case of The State v. Cory Nettles Allen that will be filed with the Court of Appeals today, May 8, 2017. Counsel is preparing the initial brief of appellant and designation of matter in the case of The State v. Royres Antwon Patterson. Counsel filed the initial brief of appellant and designation of matter in the case The State v. Arsenio D. Colclough with the Court of Appeals on April 28, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Allen Rauch v. The State with the this Court on April 24, 2017. On April 17, 2017, counsel filed the petition for writ of certiorari and accompanying appendix in the case of The State v. Jalann Williams with this Court. On April 13, 2017, counsel had an oral argument in the case of Marion Bowman v. The State before this Court. On April 12, 2017, counsel had an oral argument in the case of The State v. Sandy Lynn Westmoreland before the Court of Appeals. On April 7, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tyrone Quick with the Court of Appeals. On April 7, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Teresa Ann McCracken-Hall with the Court of Appeals. On April 4, 2017, counsel, was co-counsel to, Laura M. Baer, when they filed the initial brief of appellant and designation of matter in the case of The State v. Robert Graham with the Court of Appeals. On March 31, 2017, counsel filed the reply in support of petition for a writ of certiorari in the case of Bryan Rearick v. State with the U.S. Supreme Court. On March 30, 2017, counsel filed the petition for rehearing in the case of State v. Joshua Griffith with the Court of Appeals. On March 22, 2017, counsel had an oral argument in the case of The State v. Harold Bennon Cartwright, III, before this Court. On March 20, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. Stanley Miller with the Court of Appeals. On March 15, 2017, counsel filed the initial brief of appellant and designation of matter in the SVP

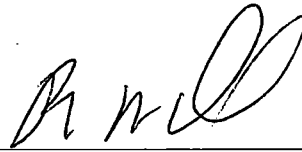
case of In the Matter of the Care and Treatment of John Henry Dorsey with the Court of Appeals. On March 10, 2017, counsel filed the initial brief of appellant and designation of matter in the case of The State v. John M. Ghent, Jr. with the Court of Appeals. On March 9, 2017, counsel, along with co-counsel, Lara M. Caudy, filed the reply brief of petitioner in the case of The State v. Ryan P. Deleston with this Court. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training two less experienced appellate defenders and interviewing for open positions.**

3. As indicated by his consent below, counsel for the state does not oppose this request.

4. 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 **final thirty (30) day extension, until June 7, 2017**, in which to file the petition for writ of certiorari and accompanying appendix. 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,



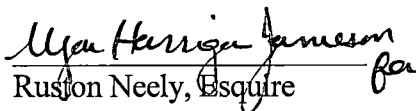
Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

May 8, 2017

I do not oppose:



Ruston Neely, Esquire