

 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Charleston County

Deadra L. Jefferson, Circuit Court Judge

RECEIVED

MAY 23 2012

S.C. Supreme Court

DARRELL L. GOSS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
FROM THE COURT OF APPEALS
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a thirty-day extension in which to file the petition for writ of certiorari from the Court of Appeals and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

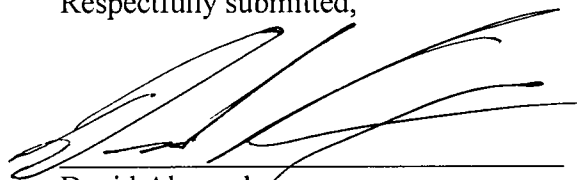
1. The petition for writ of certiorari from the Court of Appeals and accompanying appendix in this case are due to be served and filed today. This case was reassigned to counsel after Appellate Defender Elizabeth A. Franklin-Best left this office for private practice on April 30, 2012.

2. Counsel began at the Office of Appellate Defense on Monday, May 14, 2012. Counsel filed the petition for writ of certiorari in Daniel B. Stratten v. State with this Court on May 22, 2012. Counsel is filing the petition for writ of certiorari in Michael Anthony Sarratt v. State also with this Court today, May 23, 2012. Counsel is preparing the petition for writ of certiorari in Chan Bun v. State to be filed with this Court on May 29, 2012. Counsel is also preparing the initial brief of appellant and designation of matter in State v. Roosevelt Reaves to be filed with the Court of Appeals on May 29, 2012. Counsel is preparing the petition for writ of certiorari in Allan Lee Hawkins v. State to be filed with this Court on May 30, 2012

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,

A handwritten signature in black ink, appearing to read 'D. Alexander', written over a horizontal line.

David Alexander
Appellate Defender

May 23, 2012

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Anderson County

Alexander S. Macaulay, Circuit Court Judge

ANTONIO GLOVER,

PETITIONER,

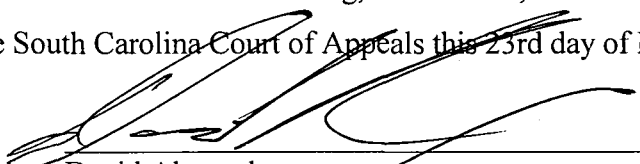
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

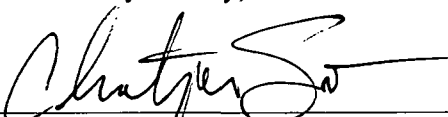
CERTIFICATE OF SERVICE

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 Matthew J. Friedman, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, and the South Carolina Court of Appeals this 23rd day of May, 2012.


David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 23rd day of May, 2012.


Notary Public for South Carolina (L.S.)

My Commission Expires: May 16, 2021 .