

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
Honorable R. Ferrell Cothran, Circuit Court Judge

KENNETH JOWAN CRAIG,

RECEIVED
JAN 16 2018
S.C. SUPREME COURT
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2017-001616

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

Counsel for Kenneth Jowan Craig respectfully requests an extension of thirty (30) days 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 second 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.
2. Counsel for Kenneth Jowan Craig 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.

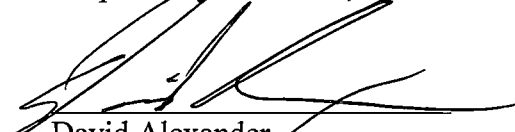
3. Counsel assisted Chief Appellate Defender Robert M. Dudek with the reply to return to petition for writ of certiorari in the death penalty case of Ricky Lee Blackwell v. South Carolina, filed on January 11, 2018 with the Supreme Court of the United States. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Wake Hunt with the Court of Appeals on January 11, 2018. Counsel filed the Petition for Writ of Certiorari in the case of James Junior Little v. State with this Court on January 4, 2018. Counsel filed the initial brief and designation of matter in the case of State v. Charles Alton Morehouse with the Court of Appeals on January 2, 2018. Counsel filed the brief of petitioner in the case of State v. James Kevin Bethel with this Court on December 15, 2017. On December 13, 2017, counsel was present to testify in circuit court before the Honorable Clifton Newman in the PCR matter of Stewart Ard v. State, pursuant to a subpoena from the Attorney General. Counsel filed the brief of appellant in the case of State v. Jason Scott Morton with the Court of Appeals on December 7, 2017. Counsel filed the Petition for Writ of Certiorari and accompanying appendix with the Supreme Court in the case of Antrell Rashawn Felder v. State on December 4, 2017. On November 30, 2017, Counsel participated in an Appellate Practice and Advocacy CLE at the Bar Conference Center in Columbia. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of James Gibson with the Court of Appeals on November 29, 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 Charles Sullivan with the Court of Appeals on November 28, 2017. Counsel filed the brief of petitioner in the case of Darrell L. Goss v. State with this Court on November 20, 2017. On November 15, 2017, counsel had oral arguments before this Court in the case of State

v. Gerald Barrett. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of State v. Lorenzo Bernard Young with this Court on November 13, 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.

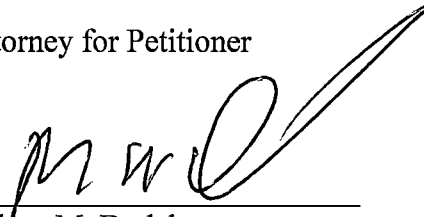
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander
Appellate Defender

Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 16th day of January, 2018

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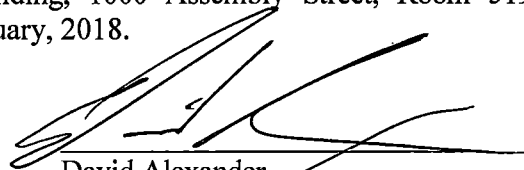
V.

STATE OF SOUTH CAROLINA,

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CERTIFICATE OF SERVICE

I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Valerie G. Giovanoli, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 16th day of January, 2018.



David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this
16th day of January, 2018.

Mark Leavelle (L.S.)
Notary Public for South Carolina
My Commission Expires: July 3, 2023.