

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Laurens County  
G. Thomas Cooper, Circuit Court Judge  
\_\_\_\_\_

ORIGINAL

RECEIVED

MAR 28 2018

S.C. SUPREME COURT

ERICA LEIGH ANDERSON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2017-001888  
\_\_\_\_\_

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

The undersigned counsel respectfully requests a **final thirty day extension, until April 27, 2018**, 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 filed the initial brief of appellant and designation of matter in the case of The State v. Howard Woods with the Court of Appeals on March 23, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kayla Wright with the Court of Appeals on March 21, 2018. Counsel filed the petition for writ of certiorari and accompanying


appendix in the case of Matthew Jackson v. The State with this Court March 19, 2018. Counsel presented March 16, 2018, in Charleston, SC for the Charleston and Berkeley County Public Defenders and private defense conflict attorneys on Preserving the Record on Appeal. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Antwon Baker with the Court of Appeals on March 14, 2018. Counsel presented March 9, 2018, for the Criminal Sexual Conduct CLE at the Columbia Metropolitan Convention Center. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Charles Davis with the Court of Appeals on March 8, 2018. Counsel filed the petition for writ of certiorari in the case of Raphael Wooden v. The State with this Court on March 2, 2018. Counsel presented at the 27<sup>th</sup> Annual Criminal Law Seminar on February 23, 2018. Counsel had an oral argument in the case of The State v. Jeffrey Dana Andrews heard in the Court of Appeals on February 14, 2018. Counsel filed the initial brief of appellant and designation of matter in the murder case of The State v. Horace Elijah Watts with the Court of Appeals on February 12, 2018. Counsel filed the initial brief of appellant and designation of matter in the attempted murder case of The State v. Joshua Maiden with the Court of Appeals on February 9, 2018. Counsel had an oral argument in the case of The State v. Richard Krochmal heard in the Court of Appeals on February 6, 2018. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training two less experienced appellate defenders.**

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

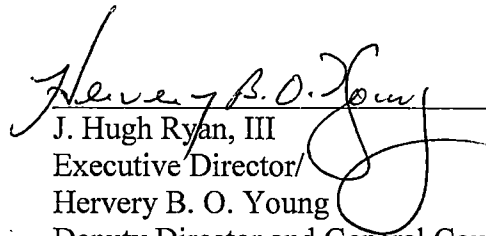
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until April 27, 2018**, 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,



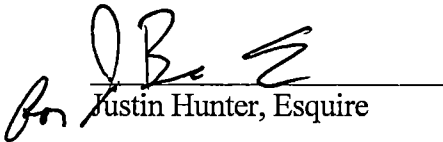
Robert M. Dudek  
Chief Appellate Defender



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

March 28, 2018

I do not oppose:



Justin Hunter, Esquire