

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
R. Lawton McIntosh, Circuit Court Judge

ORIGINAL

RECEIVED

MAY 29 2012

S.C. Supreme Court

JABBAR J. STRAWS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

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

Counsel for Jabbar J. Straws 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:

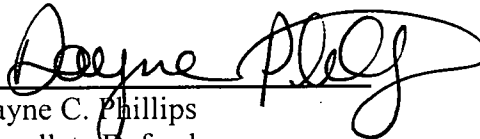
1. The petition for writ of certiorari and appendix is due to be served and filed with the Court today, May 29, 2012.
2. Counsel for Mr. Straws respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.
3. On May 23, 2012 counsel had an oral argument in the case of State v. Lucius Simuel in this Court. On May 21, 2012 counsel filed the initial brief of appellant and designation of matter in

Charles Walshaw v. State with the Court of Appeals. On May 16, 2012 counsel filed the petition for writ of certiorari and appendix in Johnny Paden v. State in this court. On May 14, 2012 counsel filed the initial brief of appellant and designation of matter in James Byers v. State in the Court of Appeals. On May 8, 2012 counsel filed the initial reply brief in State v. Joseph Paugh in the Court of Appeals. On May 4, 2012 counsel filed the petition for writ of certiorari and appendix in Steven J. Freeman v. State in this Court. On May 2, 2012 counsel filed the petition for writ of certiorari and appendix in John Randolph v. State in this Court. On April 30, 2012 counsel filed the petition for writ of certiorari and appendix in Kevin Allison v. State in this Court. On April 26, 2012 counsel filed the petition for writ of certiorari and appendix in Raymond Murray v. State in this Court. On April 25, 2012 counsel filed the Reply to Respondent's Return to Appellant's Motion to Hold Appeal in Abeyance in State v. Richard Gagnon in the Court of Appeals. On April 18, 2012 counsel filed the petitions for writ of certiorari and appendices in Antwan Wade v. State and Stacy Evans v. State in this Court. On April 6, 2012 counsel filed the petition for writ of certiorari and appendix in Ricky Dale Gilstrap v. State in this Court.

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,


Dayne C. Phillips
Appellate Defender
Attorney for Petitioner

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Lexington County
, Circuit Court Judge

JABBAR J. STRAWS,

PETITIONER,

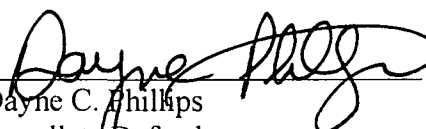
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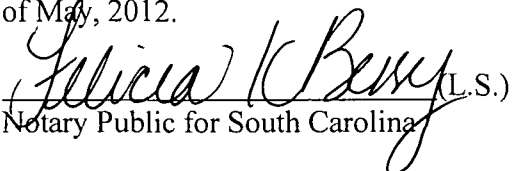
CERTIFICATE OF SERVICE

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 Kaelon May, Esquire, this 29th day of May, 2012.


Dayne C. Phillips
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 29th day
of May, 2012.


Notary Public for South Carolina (L.S.)

My Commission Expires: June 21, 2020.