

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Greenville County

Larry R. Patterson, Circuit Court Judge

RECEIVED

MAR - 8 2013

S.C. Supreme Court

THE STATE,

PETITIONER,

V.

ROBERT WATKINS,

RESPONDENT,

APPELLATE CASE NO. 2011-195272

PETITION FOR EXTENSION TO FILE
THE BRIEF OF RESPONDENT

The undersigned counsel respectfully requests a thirty day extension in which to file the brief of respondent in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The brief of respondent is due to be served and filed today in case.
2. Counsel is currently working on a **death penalty case** in Marion Bowman v. State.

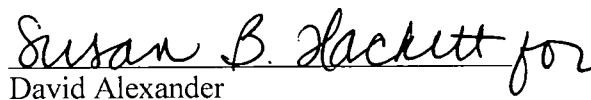
On Wednesday, March 6, 2013, counsel filed the brief of appellant and record on appeal in State v. Kurt Kalani Sparks in the Court of Appeals. On Friday, March 1, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sherman Dewalt v. State in this Court. On Thursday, February 28, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Kenneth Lee Huckabee v. State in this Court. On Wednesday, February 27, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyquan Jared Jones v. State in this Court. On Friday, February 22, 2013, counsel filed the brief of appellant and record on appeal in State v. Andrew Brent Scott in the Court of Appeals. On Thursday, February 14, 2013 counsel filed the petition for writ of certiorari and accompanying appendix in the

case of Brenda Gail Cutro v. State, which had an appendix of over **5,700 pages**, in this Court. On Friday, February 8, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ryan Antonio Chapman v. State in this Court. On Friday, February 8, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Lathan v. State in this Court. On Wednesday, February 6, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Garfield DePriest v. State in this Court. On Tuesday, February 5, 2013, counsel filed the initial brief of appellant and designation of matter in State v. John J. Day in the Court of Appeals. On Tuesday, February 5, 2013, Counsel had an oral argument in the Court of Appeals in the case of State v. Manuel Marin. On Thursday, January 31, 2013, counsel filed the petition for writ of certiorari in Antonio Williams v. State in this Court. On Friday, January 25, 2013, counsel filed the initial brief of appellant and designation of matter in State v. Julian Deandre Battle in the Court of Appeals. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Sterling Green v. State in this Court on Monday, January 21, 2013. On Monday, January 14, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in Heyward Robinson v. State in this Court and the brief of appellant and Record on Appeal in State v. Alfred Jackson in this Court. Counsel had an oral argument in this Court in the case of State v. Robert Jolly on January 10, 2013.

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 brief of respondent be held in abeyance pending a ruling on this motion.

Respectfully submitted,


David Alexander
Appellate Defender

March 8, 2013

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THE STATE,

PETITIONER,

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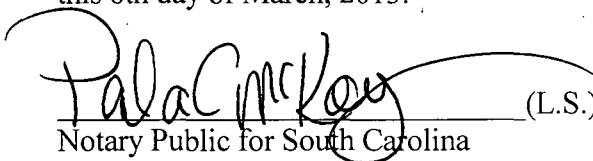
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file the brief of respondent in the above referenced case has been served upon William W. Blich Jr. Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 8th day of March, 2013.


David Alexander
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 8th day of March, 2013.



Notary Public for South Carolina

(L.S.)

My Commission Expires July 24, 2022.