

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

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Case No. 2008-CP-10-0057

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Anthony Mann, 242498,

Petitioner,

v.

State of South Carolina,

Respondent.

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MOTION FOR EXTENSION OF TIME TO FILE PETITION AND APPENDIX

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The Petitioner, through his undersigned counsel, respectfully requests this Honorable Court grant an additional extension of the deadline for filing the petition and appendix in this matter. Because of the extraordinary circumstances described below, counsel respectfully requests this Court grant a thirty-day extension.

The lower court record in this matter is nearly 2000 pages. In addition, counsel has identified numerous meritorious issues for petition, which has resulted in a far more complex petition than usual.

In addition, counsel is currently involved in a lengthy and complex RICO trial in the United States District Court involving the Hells Angels Motorcycle Club. The case is one of the most complex cases filed in this district in recent history.

A verdict in the guilt phase of this trial was reached yesterday, after five weeks in court. At this point, there are two more trial phases to complete. The jury must decide

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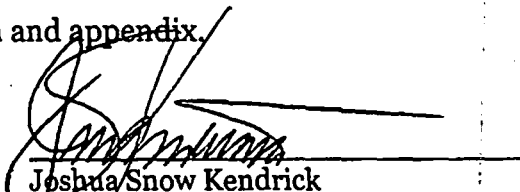
on drug weight and forfeiture issues. Counsel anticipates this part of the trial to last additional two or three days.

Because of the length of the record in this matter, the complexity of the legal issues involved, counsel's current caseload and the important appellate rights at stake, counsel believes an extension is necessary for the diligent and competent representation of Petitioner.

Though counsel has been unable to consult with opposing counsel, the nature of the reasons for the request and the delay requested lead counsel to believe this request will not cause any prejudice to either party.

In addition, counsel has enlisted the assistance of his co-counsel from the PCR hearing to complete this petition. With this assistance, counsel believes he will be able to complete the petition within thirty days.

Based on these reasons, counsel respectfully requests this Honorable Court grant a thirty-day extension for filing of the petition and appendix.



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March 15, 2013  
Columbia, South Carolina