

 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Greenville County

Larry R. Patterson, Circuit Court Judge

RECEIVED

APR -9 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 **final thirty day extension, until May 8, 2013**, in which to file the return to 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 return to the brief of respondent in this case is due to be served and filed today.
2. Counsel is currently working on a **death penalty case** in Marion Bowman v. State. Counsel is currently working on a Petition for Writ of Certiorari to be filed with the United States Supreme Court in the case of Danny Brown v. State of South Carolina. On Thursday, April 4, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the

case of Angel Gonzales v. State in this Court. On Monday, March 25, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jeffery Augustine v. State in this Court. On Friday, March 22, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Boyce Lee Nesbitt v. State in this Court. On Thursday March 21, 2013, counsel filed the initial brief of appellant and designation of matter in State v. In the interest of Tyairy G., A Minor in the Court of Appeals. On Friday, March 15, 2013, counsel filed the brief of appellant and record on appeal in State v. Antwon Byars in the Court of Appeals. Counsel also filed the initial brief of appellant and designation of matter in State v. Henry Gray in the Court of Appeals. On Monday, March 11, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adrian A. Allen v. State in this Court. 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 the Court of Appeals. 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 the Supreme 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.

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.

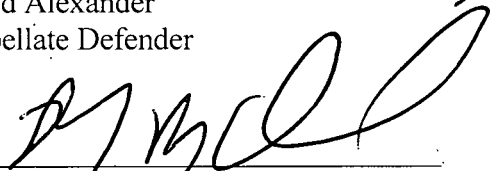
WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until May 8, 2013**. Counsel respectfully requests that the time limits for filing the return to the petition for writ of certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,

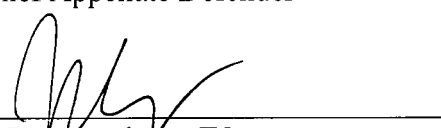


David Alexander
Appellate Defender

For



Robert M. Dudek
Chief Appellate Defender



T. Patton Adams, IV
Executive Director or
J. Hugh Ryan, III
General Counsel

April 8, 2013

I do not oppose:



William W. Blich Jr