

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

Case No. 2008-CP-10-0057

Anthony Mann, 242498,

Petitioner,

v.

State of South Carolina,

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE PETITION AND APPENDIX

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. Counsel is aware that this Court stated no further extensions would be granted absent extraordinary circumstances. 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. The Appendix is four volumes.

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

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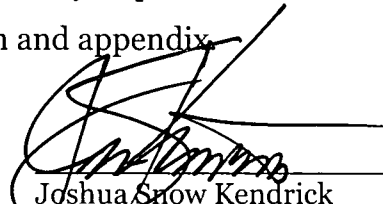
APR 16 2013

S.C. Supreme Court


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. Between counsel and his co-counsel, the majority of the issues are fully briefed and the appeal is near completion. However, Petitioner has been extremely adamant that he review and consult on all issues before they are filed. Based on the client's wishes, counsel believes it necessary to visit client before the brief is filed. Counsel is in the process of scheduling a visit with Appellant so he can review all issues and offer his position on any issues to be argued.

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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Attorney for the Petitioner

April 15, 2013
Columbia, South Carolina

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PROOF OF SERVICE

I certify that I have served the attached *Motion for Extension of Time to File Petition and Appendix* on the State of South Carolina by U.S. Mail, on April 16, 2013, addressed to the State's attorney of record, Ashleigh Wilson, South Carolina Attorney General's Office, P.O. Box 11549, Columbia, South Carolina 29211.

April 16, 2013



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