

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Oct 23 2024

S.C. SUPREME COURT

Certiorari to Bamberg County

Honorable Edward W. Miller, Circuit Court Judge

RANDY CHESTNUT,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2024-000536

MOTION FOR AN EXTENSION TO SERVE AND FILE
THE PETITION FOR WRIT OF CERTIORARI
AND APPENDIX

Counsel for Randy Chestnut respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and accompanying 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 are due to be served and filed with the Court today.
2. Counsel for Randy Chestnut 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 her caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the reply to return to petition for writ of certiorari in the case of Stepheno Alston v. The State with the Supreme Court on October 17, 2024. Counsel filed the petition for rehearing in the case of Dennis Cumbee v. The State with the Court of Appeals on October 17, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Francisco Maldonado-Molina with the Court of Appeals on October 7, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Larry King with the Court of Appeals on September 30, 2024. Counsel filed the petition for rehearing in the case of Francisco R. Rodriguez v. The State with the Court of Appeals on September 19, 2024. Counsel had an oral argument in the case of The State v. Terrell Denard Knightner before the Supreme Court in Charleston, SC on September 11, 2024. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Micah Pressley with the Court of Appeals on September 11, 2024. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of J'Quan Marquel Scott v. The State with the Supreme Court on August 28, 2024. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of The State v. Wendy Michelle Green with the Supreme Court on August 16, 2024.

4. Counsel makes this request in good faith and not for purpose of delay.

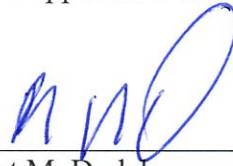
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated September 30, 2024 for all Appellate Defense extensions through October 31, 2024.

WHEREFORE, the undersigned counsel would respectfully request a thirty (30) day extension in which to serve and 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 for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Kathrine H. Hudgins
Senior Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 23rd day of October, 2024.