

STATE OF SOUTH CAROLINA
IN THE 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 a **final thirty (30) day extension, until December 23, 2024**, in which to serve and file the petition for writ of certiorari and 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 third 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

RECEIVED

Nov 22 2024

S.C. SUPREME COURT

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 petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of Francisco R. Rodriguez v. The State with the Supreme Court on November 21, 2024. Counsel filed the reply brief of petitioner in the case of Maurio D. Rivers v. The State with the Court of Appeals on November 7, 2024. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of The State v. Alexander Rhue, Jr. with the Supreme Court on November 6, 2024. Counsel filed the brief of respondent in the case of Angelo H. Taylor v. The State with the Court of Appeals on October 23, 2024. 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.

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

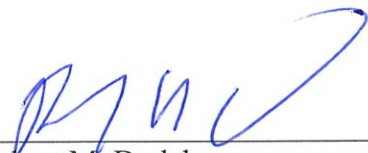
5. Opposing counsel, the Attorney General's Office, has graciously consented to this extension request by way of the thirty-day general consent granted by email from Deputy Attorney General Donald J. Zelenka dated October 30, 2024 for all Appellate Defense extensions through November 30, 2024.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until December 23, 2024**, 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
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 22nd day of November, 2024.