

 ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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OCT - 9 2013

Certiorari to Charleston County

S.C. Supreme Court

R. Markley Dennis, Jr., Circuit Court Judge

ANTONIO MOULTRIE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000632

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a thirty-day extension in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.

2. On Wednesday, September 25, 2013, counsel filed the initial brief of appellant and designation of matter in the case of State v. Rickey Hewins Mack. Counsel filed the Anders brief of


appellant and record on appeal in the case of State v. Jessica Beockete Moore on Monday, September 23, 2013. Counsel attended the Public Defender Conference in Myrtle Beach, South Carolina on September 23rd and 24th of 2013. On Friday, September 20, 2013, counsel attended the Gideon Conference in Charleston, South Carolina. On Tuesday, September 17, 2013, counsel had oral argument in this Court in the case of State v. Wesley Smith. On Friday, September 13, 2013, counsel filed the petition for rehearing in The State v. Alirio Ortis. On Thursday, September 12, 2013, counsel filed the petition for rehearing In the Interest of Justin B., a minor under the age of seventeen. On Wednesday, September 11, 2013, counsel had an oral argument in the South Carolina Court of Appeals in the case of State v. Robert M. Jones. On Tuesday, September 10, 2013, counsel had an oral argument in the South Carolina Court of Appeals in the case of State v. Frankie Lee McGee. On Monday, September 9, 2013, counsel filed the initial brief of appellant and designation of matter in the case of State v. Frederick R. Chappell. On Tuesday, September 3, 2013, counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of D'el Grant v. State. On Wednesday, August 21, 2013, counsel filed Johnson petition for writ of certiorari and accompanying appendix in the case of Harold Orr v. State. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Mykel Johnson on Monday, August 19, 2013. Also on Monday, August 19, 2013 counsel filed the initial reply brief in the case of State v. Julio Angelo Hunsberger. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Brandon Green on Wednesday, August 14, 2013. Also on Wednesday, August 14, 2013 counsel filed the petition for writ of certiorari and accompanying appendix in Bobby Pyke v. State. On Tuesday, August 13, 2013, counsel filed the petition for writ of certiorari and accompanying appendix in Anthony M. Brown v. State.

3. 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 thirty day extension. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Kathrine H. Hudgins
Appellate Defender

October 9, 2013

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Charleston County

R. Markley Dennis, Jr., Circuit Court Judge

ANTONIO MOULTRIE,

PETITIONER,

V.

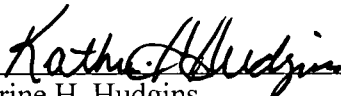
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2013-000632

CERTIFICATE OF SERVICE

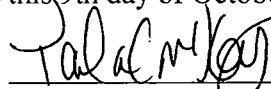
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Ashleigh Wilson, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201 this 9th day of October, 2013.



Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 9th day of October, 2013.



(L.S.)
Notary Public for South Carolina
My Commission Expires: July 24, 2022.