

ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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JUL - 8 2016

Certiorari to Lancaster County  
R. Knox McMahon, Circuit Court Judge

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SC SUPREME COURT

HEYWARD TRUESDALE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-000064

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MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE THE PETITION FOR WRIT OF  
CERTIORARI AND APPENDIX

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Counsel for Petitioner respectfully requests a **final thirty (30) day extension, until August 8, 2016**, in which to 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 filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Petitioner 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed petition for writ of certiorari and accompanying appendix in the case of State v. Michael Carter with the Supreme Court on June 30, 2016. Counsel filed petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of State v. Gerald Barrett with the Supreme Court on June 28, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Richard Tedford with the Court of Appeals on June 2, 2016. Counsel filed the brief of appellant and designation of matter in the case of State v. Robert Wazney with the Court of Appeals on May 25, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Robert T., a Juvenile Under the Age of Seventeen with the Court of Appeals on May 20, 2016. Counsel had an oral argument in the case of In the Matter of the Care and Treatment of Jeffrey Chapman before the Supreme Court on May 17, 2016. Together with co-counsel Robert M. Dudek and Susan Hackett, counsel filed a petition for writ of certiorari in the case of State v. Brett Parker, in which the record exceeded 3,200 pages, with the Supreme Court on May 11, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jonathan Holder with the Court of Appeals on May 6, 2016. Counsel had an oral argument in the case of Jason Kinloch v. State before the Court of Appeals on May 2, 2016. Counsel filed petition for writ of certiorari and accompanying appendix in the case of Joseph Cobb v. State with the Supreme Court on April 28, 2016.

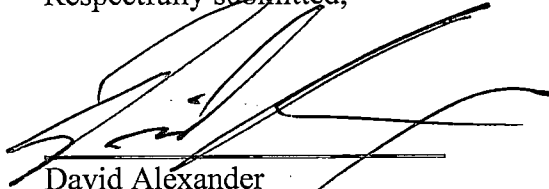
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until August 8, 2016**, in which to 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 be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander  
Appellate Defender

Attorney for Petitioner.



Robert M. Dudek  
Chief Appellate Defender

This 8<sup>th</sup> day of July, 2016.

I consent:



Croom Hunter, Esquire