

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Charleston County

Honorable Perry H. Gravely, Circuit Court Judge

DEANGELO MITCHELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-000777

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

The undersigned counsel respectfully requests a thirty day extension, **until January 13, 2017**, 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. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Jones v. The State of South Carolina in the Supreme Court on December 6, 2016.

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S.C. SUPREME COURT

Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Darrell Raines, Jr. with the Court of Appeals on November 28, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Favian Hayes with the Court of Appeals on November 28, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Donnell Hutchinson v. The State of South Carolina in the Supreme Court on November 18, 2016. Counsel filed the petition for rehearing in the case of The State v. Donte Samar Brown with the Court of Appeals on November 17, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Edward Tyler v. The State of South Carolina in the Supreme Court on November 17, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Albert Owens v. The State of South Carolina in the Supreme Court on October 31, 2016. Counsel filed the petition for rehearing in the case of The State v. Daniel Martinez Herrera with the Court of Appeals on October 27, 2016. Counsel filed the reply brief pursuant to White v. State in the case of Daniel Hamrick v. The State of South Carolina in the Supreme Court on October 27, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Deitrich Funchess v. The State of South Carolina in the Supreme Court on October 26, 2016. Counsel attended a reconstruction hearing in the case of The State v. Joe Ross Worley on October 25, 2016. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Brandon Jermaine Benson with the Court of Appeals on October 17, 2016.

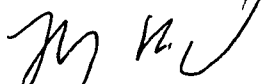
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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,



John H. Strom
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

December 14, 2016

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Charleston County

Honorable Perry H. Gravely, Circuit Court Judge

DEANGELO MITCHELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

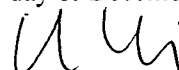
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Alicia Olive, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 14th day of December, 2016.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 14th day of December, 2016.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12th, 2025.