

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

RECEIVED

JAN 17 2017

Appeal from Charleston County

Honorable Perry H. Gravelly, Circuit Court Judge

S.C. SUPREME COURT

DEANGELO MITCHELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-000777

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

Counsel respectfully requests a **final extension of thirty (30) days until February 16, 2017**, 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 is due to be served and filed with the Court today.
2. Counsel 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 the petition for writ of certiorari and accompanying appendix in the case of Tyris B. Glover v. The State of South Carolina in the Supreme Court on January 12, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Hassan Tyler with the Court of Appeals on December 16, 2016. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Christopher Roberts v. The State of South Carolina in the Supreme Court on December 16, 2016. 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. 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.

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

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

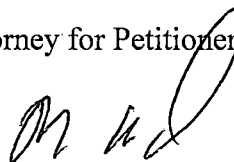
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until February 16, 2017**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



John H. Strom
Appellate Defender


Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 17th day of January, 2016

I Consent:

for 
Alicia Olive, Esquire