

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Appeal from Orangeburg County

Honorable Benjamin H. Culbertson, Circuit Court Judge

\_\_\_\_\_  
JOSHUA DAVID SHAW CROSBY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-002402

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

The undersigned counsel respectfully requests a thirty day extension, **until June 23, 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 initial brief of appellant and designation of matter in the case of The State v. Janoblin Maurice Bracey-Brown with the Court of Appeals on May 8, 2017.

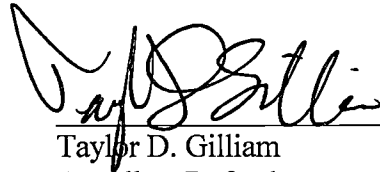
ORIGINAL  
RECEIVED  
MAY 24 2017  
S.C. SUPREME COURT

Counsel filed the petition for writ of certiorari in Gregory Allan Ivery v. State with the Supreme Court on April 24, 2017. Counsel filed the petition for writ of certiorari in Christopher Poage v. State with the Supreme Court on April 24, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Eriva Youmous v. State of South Carolina with the Supreme Court on April 14, 2017. Counsel held an oral argument in the case of The State v. Demario Thompson in the Court of Appeals on April 11, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyrik Bright v. State of South Carolina with the Supreme Court on April 6, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Matthew Frazier v. State of South Carolina with the Supreme Court on March 23, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jarvis Hughes with the Court of Appeals on March 15, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brian Stapleton v. State of South Carolina with the Supreme Court on March 13, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Dean Henry Cole v. State of South Carolina with the Supreme Court on March 10, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Cathy Dawn Skates with the Court of Appeals on March 1, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Kalvin Brown with the Court of Appeals on February 27, 2017.

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.

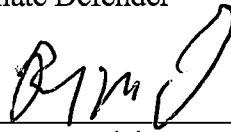
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



---

Taylor D. Gilliam  
Appellate Defender



---

Robert M. Dudek  
Chief Appellate Defender

May 24, 2017

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Orangeburg County

Honorable Benjamin H. Culbertson, Circuit Court Judge

JOSHUA DAVID SHAW CROSBY,

PETITIONER

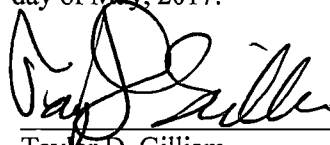
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

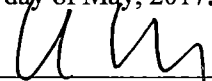
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Ruston Neely, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 24<sup>th</sup> day of May, 2017.



Taylor D. Gilliam  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 24<sup>th</sup> day of May, 2017.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: May 12<sup>th</sup>, 2025.