

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to York County

Honorable John C. Hayes, Circuit Court Judge

RECEIVED
JUL 26 2017
S.C. SUPREME COURT

JEREMY CORDERA MOBLEY,

PETITIONER

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2017-000843

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

The undersigned counsel respectfully requests a thirty day extension, **until August 25, 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 rehearing in the case of The State v. Jo Pradubsri in the Court of Appeals on July 25, 2017. Counsel filed the initial brief of appellant and designation

of matter in the case of The State v. Herbie Val Singleton, Jr. in the Court of Appeals on July 19, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Ontario Stefon Patrick Makins in the Court of Appeals on July 14, 2017. Counsel filed the return to the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of The State of South Carolina v. Alexander Carmichael Huckabee, III in the Supreme Court on July 11, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Billy Geisendorff in the Court of Appeals on July 7, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Douglas Kelly Phillips in the Court of Appeals on July 5, 2017.

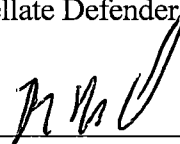
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

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,



John H. Strom
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

July 26, 2017

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to York County

Honorable John C. Hayes, Circuit Court Judge

JEREMY CORDERA MOBLEY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

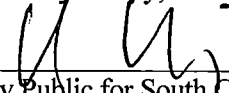
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Justin Hunter, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 26th day of July, 2017.



John H. Strom
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 26th day of July, 2017.

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