

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Spartanburg County

Honorable Edward W. Miller, Circuit Court Judge

RECEIVED

AUG 09 2017

MARK STEPHEN WINGO,

S.C. SUPREME COURT

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2017-000991

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

The undersigned counsel respectfully requests a thirty day extension, **until September 8, 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:

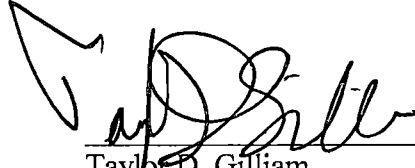
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the petition for writ of certiorari in Dennis Temple v. State with the Supreme Court on August 2, 2017. Counsel filed the petition for rehearing in the case of The

State v. John William Dobbins with the Court of Appeals on July 27, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Evelyn Christine Nixon with the Court of Appeals on July 26, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Ronald Douglas Michaux, Jr. with the Court of Appeals on July 24, 2017. Counsel filed the petition for writ of certiorari in Joshua David Crosby v. State with the Supreme Court on July 21, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Latique Kareem Bracey with the Court of Appeals on June 29, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Thomas Dukes with the Court of Appeals on June 26, 2017. 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. 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.

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,

A handwritten signature in black ink, appearing to read 'Taylor D. Gilliam', written over a horizontal line.

Taylor D. Gilliam  
Appellate Defender

A handwritten signature in black ink, appearing to read 'Robert M. Dudek', written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

August 9, 2017

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Spartanburg County

Honorable Edward W. Miller, Circuit Court Judge

\_\_\_\_\_  
MARK STEPHEN WINGO,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

\_\_\_\_\_  
CERTIFICATE OF SERVICE  
\_\_\_\_\_

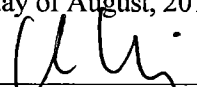
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Valerie Garcia Giovanoli, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 9<sup>th</sup> day of August, 2017.



\_\_\_\_\_  
Taylor D. Gilliam  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 9<sup>th</sup> day of August, 2017.

 (L.S.)  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: May 12<sup>th</sup>, 2025.