

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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ORIGINAL

Certiorari to Spartanburg County  
Honorable Edward W. Miller, Circuit Court Judge

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ROBERT HENRY OSBEY,

**RECEIVED**

AUG 14 2017

PETITIONER,

S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2017-001038

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

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Counsel for Robert Henry Osbey respectfully requests an extension of thirty (30) days 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 second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.

2. Counsel for Robert Henry Osbey 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 her caseload, counsel hopes that no further extension requests will be required.

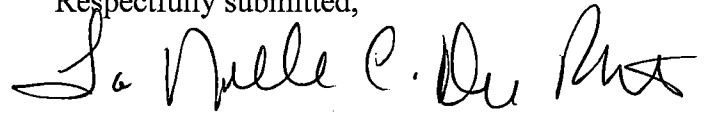
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jessica Rudd v. State with this Court on August 10, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jarrold Jacques v. State with this Court on August 8, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Bobby Parnell v. State with this Court on August 1, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Marion Kale Till with the Court of Appeals on July 26, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Yul Graham with the Court of Appeals on July 21, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of George Brown v. State with this Court on July 14, 2017. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jasmine Femis with the Court of Appeals on June 23, 2017. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Demetrice Deontre Quattlebaum v. State with this Supreme Court on June 14, 2017.

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

5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

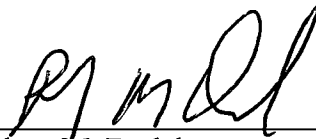
Respectfully submitted,



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LaNelle C. Durant  
Appellate Defender

Attorney for Petitioner



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Robert M. Dudek  
Chief Appellate Defender

August 14, 2017

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Spartanburg County  
Honorable Edward W. Miller, Circuit Court Judge

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ROBERT HENRY OSBEY,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

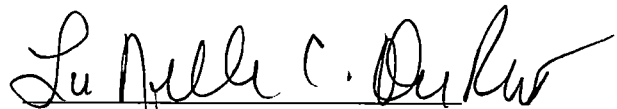
APPELLATE CASE NO. 2017-001038

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CERTIFICATE OF SERVICE

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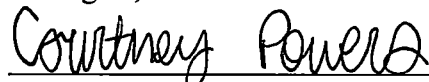
I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Valerie Giovanoli, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 14th day of August, 2017.



LaNelle C. Durant  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 14th day  
of August, 2017.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: May 2, 2027.