

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable Edward W. Miller, Circuit Court Judge

MARK STEPHEN WINGO,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2017-000991

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 October 9, 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

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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 initial brief of appellant and designation of matter in the case of The State v. Earnest Edward Vaughn, Sr. with the Court of Appeals on August 22, 2017. Counsel filed the petition for writ of certiorari in Jamie Edward Morris v. State with the Supreme Court on August 18, 2017. 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 Eriya Youmous v. State of South Carolina with the Supreme Court on April 14, 2017.

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.

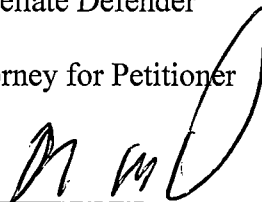
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until October 9, 2017**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



Taylor D. Gilliam
Appellate Defender

Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 8th day of September, 2017

I Consent:



Valerie Garcia Giovanoli, Esquire

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