

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Greenville County

Honorable George C. James, Circuit Court Judge

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RALPH BEVERLY HAYES,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2017-001593

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

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The undersigned counsel respectfully requests a **final thirty day extension, until February 26, 2018**, 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 of South Carolina v. Johnathan Green with the Court of Appeals on January 19, 2018. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of Albert James Cave v. The State of South Carolina with the Supreme Court on January 12, 2018.

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S.C. SUPREME COURT

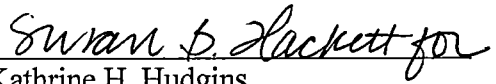
Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Adrian Vashard Simmons with the Court of Appeals on January 8, 2018. Counsel filed the Brief of Petitioner in the case of The State of South Carolina v. Demetrice R. James with the Supreme Court on December 15, 2017. Counsel filed the Johnson Petition for Writ of Certiorari and Appendix in the case of David A. Pate v. The State of South Carolina with the Supreme Court on December 11, 2017. Counsel filed the Anders Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Kevin Daniel Driggers with the Court of Appeals on December 8, 2017. Counsel was a guest speaker at the Appellate Practice Project: Presenting Cases to the Appellate Courts seminar on November 30, 2017. Counsel filed the Initial Brief of Appellant and Designation of Matter in the case of The State of South Carolina v. Jamie L. Strom with the Court of Appeals on November 29, 2017.

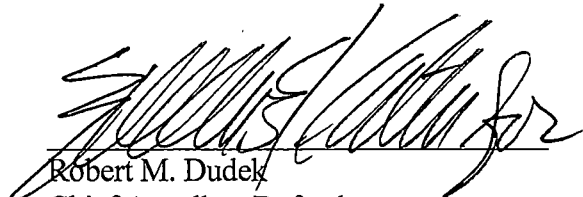
3. As indicated by his consent below, counsel for the state does not oppose this request.

4. 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 **final thirty day extension, until February 26, 2018**, in which to file the petition for writ of certiorari and accompanying appendix. 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,

  
Kathrine H. Hudgins  
Appellate Defender

  
Robert M. Dudley  
Chief Appellate Defender

January 26, 2018

I do not oppose:

  
DeShawn H. Mitchell, Esquire