

 ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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Certiorari to Spartanburg County

Honorable Frank R. Addy, Circuit Court Judge

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J'COREY SUAVE HULL-KILGORE,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2017-001682

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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 April 4, 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 is filing the petition for writ of certiorari to the Court of Appeals in State v. Richard Capell with this Court today, March 5, 2018. Counsel filed the petition for rehearing in State v. Billy Phillips with the Court of Appeals on March 1, 2018. Counsel filed the petition for writ of certiorari in Christopher Seabrook v. State with this Court on February 26, 2018. Counsel

filed the petition for writ of certiorari to the Court of Appeals in State v. Esaiveus Booker with this Court on February 20, 2018. Counsel filed the petition for rehearing in Justin Johnson v. State with the Court of Appeals on February 15, 2018. Counsel filed the initial brief of appellant in State v. Roy Smith with the Court of Appeals on February 15, 2018. Counsel filed the brief of respondent in Stephon Robinson v. State with this Court on February 9, 2018. Counsel filed the Anders brief of appellant in State v. Matthew Pickens with the Court of Appeals on February 8, 2018. Counsel filed the initial brief of appellant in State v. Ashley Tindall with the Court of Appeals on February 1, 2018. Counsel filed the initial brief of appellant in State v. Dinal Keith with the Court of Appeals on February 1, 2018. Counsel filed the petition for writ of certiorari in Alfred Henson v. State with this Court on January 29, 2018. Counsel filed the reply to return in Anthony Martin v. State with this Court on January 26, 2018. Counsel filed the brief of petitioner in Stephon Robinson v. State with this Court on January 12, 2018.

3. As indicated by her 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.

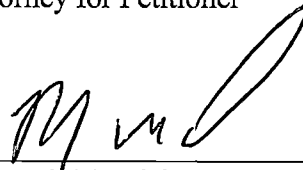
WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until April 4, 2018**. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Laura R. Baer  
Appellate Defender

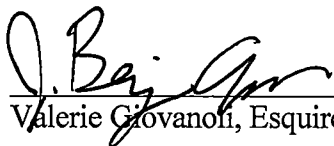
Attorney for Petitioner



Robert M. Dudek  
Chief Appellate Defender

March 5, 2018

I do not oppose:

  
Valerie Giovanoni, Esquire

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