

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Beaufort County

Diane S. Goodstein, Circuit Court Judge

DARRELL HEYWARD,

PETITIONER,

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2017-001564

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

Counsel for Darrell Heyward respectfully requests a **final thirty (30) day extension, until April 4, 2018**, 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 are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Darrell Heyward 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. This case was recently reassigned to Counsel on February 26, 2018

3. Counsel is currently preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the initial brief of appellant and designation of matter in the cases of The State v. Tappia Green and The State v. Bryan Jeffrey Ellis which she plans to file with the Court of Appeals in the upcoming weeks. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Eugene Hardy with the Court of Appeals on February 14, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Robert Bernard Campbell with the Court of Appeals on November 22, 2017.

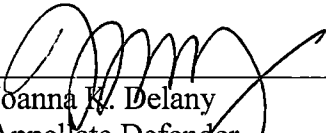
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

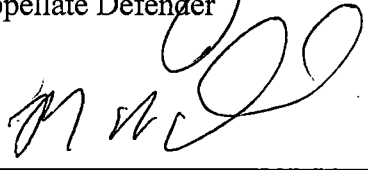
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until April 4, 2018**, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

This 5th day of March, 2018.

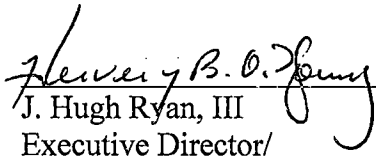
Respectfully submitted,



Joanna K. Delany
Appellate Defender

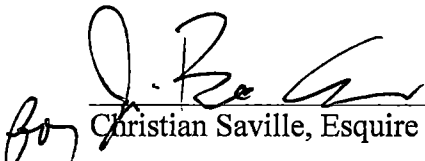


Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervey B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

I consent:



Christian Saville, Esquire