

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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 ORIGINAL

Certiorari to Williamsburg County  
D. Craig Brown, Circuit Court Judge

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RECEIVED

MAR 09 2018

TOSHONDA MICKENS,

S.C. SUPREME COURT  
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2017-001940

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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 Toshonda Mickens respectfully requests a **final thirty (30) day extension, until April 9, 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 Toshonda Mickens 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.

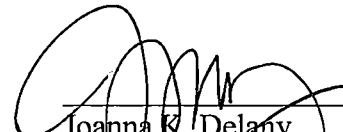
4. Counsel makes this request in good faith and not for purpose of delay.

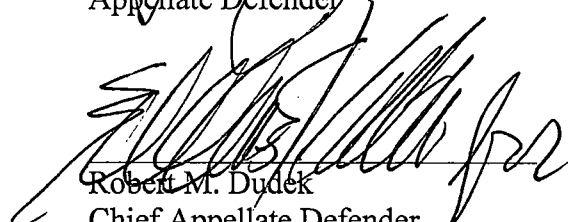
5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until April 9, 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 \* be held in abeyance pending a ruling on this motion.

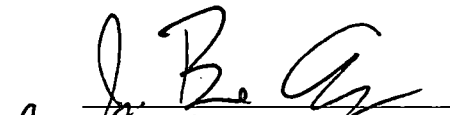
This 9th day of March, 2018.

Respectfully submitted,

  
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Joanna R. Delany  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

I consent:

  
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Julie Coleman, Esquire