

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Newberry County  
Honorable G. Thomas Cooper, Jr., Circuit Court Judge

---

DERRICK EUGENE VELASQUEZ,

RECEIVED  
APR 26 2018  
S.C. SUPREME COURT  
PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2017-001986

---

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

---

Counsel for petitioner respectfully requests an extension of thirty (30) days 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 second request for an extension. In support of this request, counsel shows:

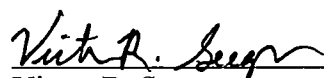
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for petitioner respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Claudius Adrian Williams v. State with this Court on April 23, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Stefano Tyshawn Brooks v. State with this Court on April 16, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Cesar O. Portillo v. State with this Court on April 6, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Cary Glenn Ryals with the Court of Appeals on March 26, 2018. Counsel had oral arguments before the Court of Appeals in the case of State v. Jonathan Donell Rhodes on March 14, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Gregory Fitzgerald Young v. State with this Court on March 2, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Channon P., a Juvenile Under the Age of Seventeen with the Court of Appeals on February 28, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Charlie Tyler Robinson v. State with this Court on February 21, 2018.

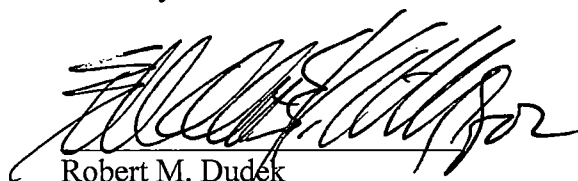
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, 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 be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
\_\_\_\_\_  
Victor R. Seeger  
Appellate Defender

Attorney for Petitioner

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 26th day of April, 2018

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Newberry County  
Honorable G. Thomas Cooper, Jr., Circuit Court Judge

---

DERRICK EUGENE VELASQUEZ,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

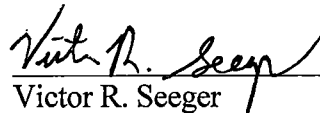
RESPONDENT

---

CERTIFICATE OF SERVICE


---

I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Justin J. Hunter, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 26th day of April, 2018.

  
\_\_\_\_\_  
Victor R. Seeger  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME  
this 26<sup>th</sup> day of April, 2018.

  
\_\_\_\_\_  
(L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 3, 2023.