

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Appeal from Williamsburg County
D. Craig Brown, Circuit Court Judge

MARTY BAGGETT,

RECEIVED

JUN 04 2018

PETITIONER,
S.C. SUPREME COURT

V.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2017-002413

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

Counsel for Marty Baggett 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 Marty Baggett 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.


3. Counsel is preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the petition for writ of certiorari in the case of Laurie Hollis v. The State which she plans to file with this Court in the upcoming weeks. Counsel will file the petition for writ of certiorari and accompanying appendix in the case of Kelvin Jackson v. The State with this Court today, June 4, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Tappia Green with the Court of Appeals on May 30, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jon Smart with the Court of Appeals on May 4, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Toshonda Mickens v. The State with this Court on April 9, 2018. Counsel filed the petition for writ of certiorari and the accompanying appendix in the case of Darrell Heyward v. The State with this Court on April 4, 2018.

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

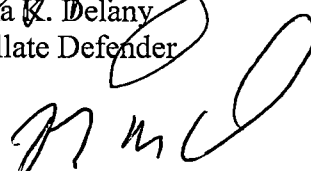
5. Counsel for the Attorney General's office has been informed of this request.

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 for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Joanna K. Delany
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 4th day of June, 2018.

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PETITIONER,

V.

THE STATE,

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CERTIFICATE OF SERVICE

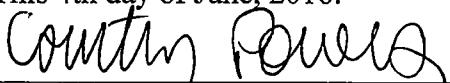
I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Julie Coleman, Esquire, at the Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 4th day of June, 2018.



Joanna K. Delany
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
This 4th day of June, 2018.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: May 2, 2027.