

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Beaufort County

Diane S. Goodstein, Circuit Court Judge  
\_\_\_\_\_

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RECEIVED

SEP 10 2018

S.C. SUPREME COURT

ANDRE GREEN,

PETITIONER

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-000002

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

Counsel respectfully requests a **final extension of thirty (30) days until October 10, 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 is due to be served and filed with the Court today.

2. Counsel 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 appendix in the case of Darryl Mungin v. State with this Court on September 5, 2018. Counsel filed the brief of appellant pursuant to White v. State in the case of Darryl Mungin v. The State with this Court on September 5, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Gerald Edwards v. State with this Court on September 5, 2018. Counsel filed the brief of appellant pursuant to White v. State in the case of Gerald Edwards v. The State with this Court on September 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Timothy Schaefer with the Court of Appeals on September 5, 2018. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Rasheed Daevon McEachern in the Court of Appeals on September 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Untonyo Johnson with the Court of Appeals on August 29, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of James Sherfield v. State with this Court on August 22, 2018. Counsel filed the petition for rehearing in the case of State v. Samuel Edward Alexander, Jr. in the Court of Appeals on August 9, 2018. Counsel filed the Anders brief of appellant and record on appeal in the case of State v. Candice Baird in the Court of Appeals on August 8, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Willie Palmer v. State with this Court on August 1, 2018. Counsel will file the initial brief of appellant and designation of matter in the case of The State v. Samuel Collins with the Court of Appeals on July 23, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Dameion Rivers v. State with this Court on July 23, 2018. Counsel filed the petition for writ of certiorari and appendix in the case

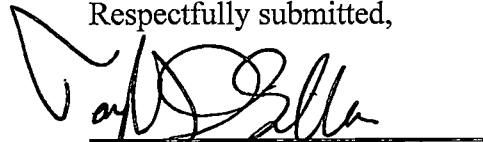
of James Dawkins v. State with this Court on July 17, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of John Kirby v. State with this Court on July 16, 2018.

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

5. Counsel for the Attorney General's office consents to this request as shown by signature below.

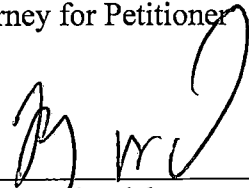
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until October 10, 2018**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



Taylor Gilliam  
Appellate Defender


Attorney for Petitioner



Robert M. Dudek  
Chief Appellate Defender

This 10th day of September, 2018.

I Consent:

  
Christian Saville, Esquire

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