

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT  
\_\_\_\_\_  
Certiorari to Colleton County  
Thomas A. Russo, Circuit Court Judge  
\_\_\_\_\_

ORIGINAL  
RECEIVED  
SEP 24 2018  
S.C. SUPREME COURT

QUASHON G. MIDDLETON,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-000063  
\_\_\_\_\_

PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI AND  
ACCOMPANYING APPENDIX  
\_\_\_\_\_

The undersigned counsel respectfully requests a **final ten day extension, until October 1, 2018**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today. **Due to the order issued by the Governor closing state government offices pursuant to the state of emergency, the Commission on Indigent Defense was closed Tuesday, September 11, 2018, through Friday, September 14, 2018.**

**2. Counsel is attending and presenting on the case law update at the Public Defender Convention in Myrtle Beach, South Carolina from September 24-26, 2018.**

Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Michael Jackson with the Court of Appeals on September 19, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Derrick Stone with the Court of Appeals on September 6, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of John Ziegler v. The State with this Court on August 30, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Perry with the Court of Appeals on August 29, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Larry Cornish with the Court of Appeals on August 23, 2018. Counsel filed the return to petition for rehearing in the case of The State v. Jeffrey Andrews with the Court of Appeals on August 17, 2018. Counsel filed the return to petition for writ of certiorari to the Court of Appeals in the case of The State v. Richard P. Krochmal with this Court on August 9, 2018. Counsel filed the petition for rehearing in the case of The State v. Jeffrey Andrews with the Court of Appeals on August 2, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Derrick Darby v. The State with this Court on August 1, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ron Santa McCray v. The State with this Court on July 30, 2018. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training two less experienced appellate defenders.**

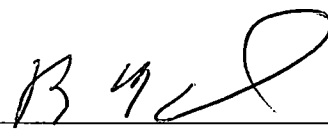
3. As indicated by his consent below, counsel for the state does not oppose this request.

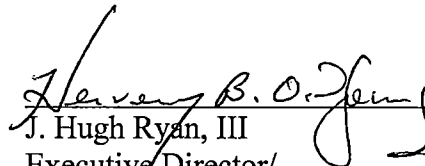
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will

hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final ten day extension, until October 1, 2018**, in which to file the petition for writ of certiorari and accompanying appendix. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,

  
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Robert M. Dudek  
Chief Appellate Defender

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

September 24, 2018

I do not oppose:

  
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Christian Saville, Esquire