

 ORIGINAL

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Appeal from Charleston County  
Maite Murphy, Circuit Court Judge

---

JAMES L. MOORE,

v.

THE STATE,

RECEIVED  
OCT 10 2018  
PETITIONER, SUPREME COURT

RESPONDENT.

APPELLATE CASE NO. 2018-001051

---

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

---

Counsel for James L. Moore 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 James L. Moore 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 filed the initial brief of appellant and designation of matter in the case of The State v. Franklin Dell Hayes with the Court of Appeals on October 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Alqi Dhimo with the Court of Appeals on October 5, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Terrence J. Goss v. The State with this Court on October 3, 2018. On September 24 – 26, 2018, counsel attended the Public Defender Convention in Myrtle Beach, South Carolina. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny Lee Paden v. The State with the Court of Appeals on September 17, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Wilton Q. Greene v. The State with this Court on August 29, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Christopher Hart with the Court of Appeals on August 22, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Randy Wright with the Court of Appeals on August 22, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Anthony B. Lay v. The State with this Court on August 15, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Cole Brooks Gray with the Court of Appeals on August 10, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Marty Baggett v. The State with this Court on August 6, 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,

*Lara M Candy* for:

Joanna K. Delany  
Appellate Defender

*M M*

Robert M. Dudek  
Chief Appellate Defender

This 10th day of October 2018.

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Appeal from Charleston County  
Maite Murphy, Circuit Court Judge

---

JAMES L. MOORE,

PETITIONER,

V.

THE STATE,

RESPONDENT.

---

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 Megan Harrigan Jameson, Esquire, at the Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 10th day of October, 2018.

*Lara M. Caudy for:*  
\_\_\_\_\_  
Joanna K. Delany  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 10th day of October, 2018.

*Martha Sydney Day* (L.S.)  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: July 26, 2028.