

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Charleston County  
Maite Murphy, Circuit Court Judge

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ORIGINAL  
**RECEIVED**

OCT 15 2018

S.C. SUPREME COURT

JOE LOUIS BAILEY,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-000957

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

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Counsel for Joe Louis Bailey respectfully requests a **final thirty (30) day extension, until November 14, 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 are due to be served and filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Joe Louis Bailey respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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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 Anders brief of appellant and designation of matter in the case of State v. Muttaqin Fatir Abdullah with the Court of Appeals on October 5, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Forrest Nelson, Jr. v. The State with the Supreme Court on September 28, 2018. Counsel filed the Anders brief of appellant pursuant to White v. State in the case of Cary Glenn Ryals v. State with the Supreme Court on September 24, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix and supplemental appendix in the case of Cary Glenn Ryals v. State with the Supreme Court on September 24, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ronald Edward Gooden v. The State with the Supreme Court on September 17, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael Duran Watson v. The State with the Supreme Court on August 31, 2018. Counsel filed the petition for writ of certiorari and Johnson petition for writ of certiorari pursuant to Austin v. State along with the accompanying appendix in the case of Deshaun A. Drafts v. The State with the Supreme Court on August 24, 2018. Counsel filed the Anders brief of appellant and designation of matter in the case of The State v. Marcus Antonio Mack with the Court of Appeals on August 17, 2018.

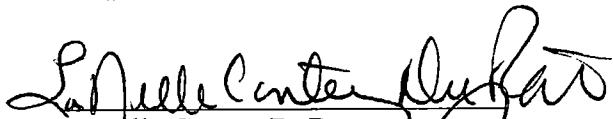
4. Counsel makes this request in good faith and not for purpose of delay.

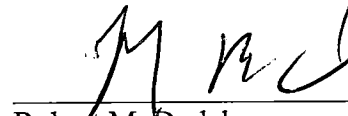
5. Counsel for the Attorney General's office has been informed of this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until November 14, 2018**, 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.

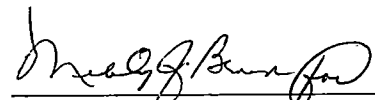
This 15th day of October, 2018.

Respectfully submitted,

  
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LaNelle Cantey DuRant  
Appellate Defender

  
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Robert M. Dudek  
Chief Appellate Defender

I consent:

  
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Megan Harrigan Jameson, Esquire