

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Charleston County

Maite Murphy, Circuit Court Judge

RECEIVED

OCT 17 2018

S.C. SUPREME COURT

DANIEL J. JENKINS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001050

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

The undersigned counsel respectfully requests a thirty day extension 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.

2. Counsel is preparing for an oral argument in the case of The State v. Jalann Williams with this Court on October 18, 2018. Counsel is filing the initial brief of appellant and designation of matter in the case of The State v. Jamil Ali with the Court of Appeals today, October

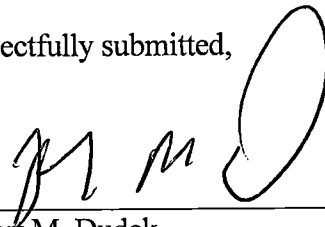
17, 2018. Counsel had an oral argument in the case of The State v. Joseph Bowers with the Court of Appeals on October 10, 2018. Counsel had an oral argument in the case of The State v. Teresa Ann McCracken-Hall with the Court of Appeals on October 10, 2018. Counsel had an oral argument in the case of The State v. Ahshaad Owens with the Court of Appeals on October 9, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Hakeem Edwin with the Court of Appeals on October 8, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Quashon Middleton v. The State with this Court on October 4, 2018. Counsel attended and presented on 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 also has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training two less experienced appellate defenders**

3. 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 thirty day extension. 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,

A handwritten signature in black ink, consisting of stylized initials 'R M' followed by a large, loopy flourish that resembles a capital 'D'.

Robert M. Dudek
Chief Appellate Defender

October 17, 2018

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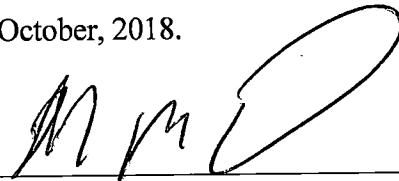
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RESPONDENT

APPELLATE CASE NO. 2018-001050

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Benjamin Limbaugh, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 17th day of October, 2018.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 17th day of October, 2018.

Christy Powers (L.S.)

Notary Public for South Carolina

My Commission Expires: May 2, 2027.