

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Oconee County

J. Cordell Maddox, Circuit Court Judge  
\_\_\_\_\_

 ORIGINAL

**RECEIVED**  
NOV 05 2018  
S.C. SUPREME COURT

JONATHAN A. FINNEY,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-000842  
\_\_\_\_\_

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:

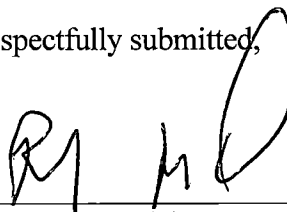
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Latrone Butler v. The State with this Court on November 2, 2018. Counsel is preparing for the criminal law Comcast CLE on October 31, 2018. Counsel filed the initial brief of appellant

and designation of matter in the case of The State v. Theron Marquis Murray with the Court of Appeals on October 25, 2018. Counsel had an oral argument in the case of The State v. Jalann Williams before this Court on October 18, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jamil Ali with the Court of Appeals on October 17, 2018. Counsel had an oral argument in the case of The State v. Joseph Bowers before the Court of Appeals on October 10, 2018. Counsel had an oral argument in the case of The State v. Teresa Ann McCracken-Hall before the Court of Appeals on October 10, 2018. Counsel had an oral argument in the case of The State v. Ahshaad Owens before 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 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, appearing to read 'R. M. Dudek', written over a horizontal line.

Robert M. Dudek  
Chief Appellate Defender

November 5, 2018

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Oconee County

J. Cordell Maddox, Circuit Court Judge  
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JONATHAN A. FINNEY,

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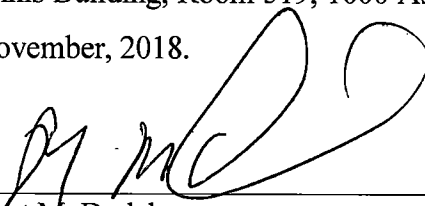
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-000842  
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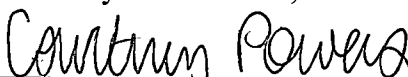
CERTIFICATE OF SERVICE  
\_\_\_\_\_

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 Kelly Oppenheimer, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 5th day of November, 2018.

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 5th day of November, 2018.

 (L.S.)  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: May 2, 2027.