

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Colleton County
Thomas A. Russo, Circuit Court Judge

RECEIVED

NOV 07 2018

RAYMOND POWELL,

S.C. SUPREME COURT
PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001454

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

Counsel for Raymond Powell 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 Raymond Powell 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 petition for writ of certiorari with the accompanying appendix in the case of Bradley Gerald Mullins v. The State with this Court on November 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Christopher Greene, III with the Court of Appeals on October 30, 2018. 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.

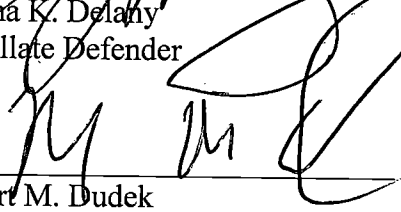
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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,



Joanna K. Delany
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 7th day of November, 2018.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Colleton County
Thomas A. Russo, Circuit Court Judge

RAYMOND POWELL,

PETITIONER

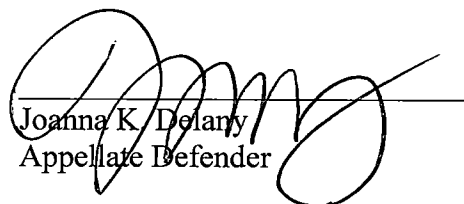
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

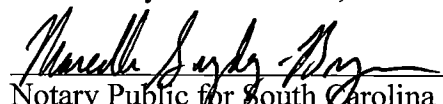
CERTIFICATE OF SERVICE

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 Christian Saville, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Columbia, S.C., 29201, this 7th day of November, 2018.


Joanna K. Delany
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 7th day of November, 2018.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: July 26, 2028.