

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Greenville County  
Letitia H. Verdin, Circuit Court Judge

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NOV 21 2018

S.C. SUPREME COURT

EDWARD LEE WHITLOCK, JR.

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-000947

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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 Edward Lee Whitlock 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 Edward Lee Whitlock 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.

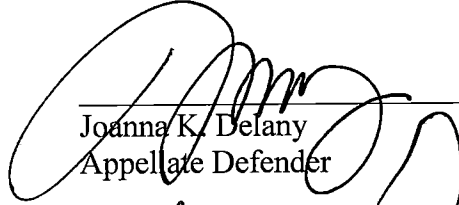
3. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Robert Powell with the Court of Appeals on November 21, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Terrance L. Bland with the Court of Appeals on November 16, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of In the Interest of Zahi H., a Juvenile Under the Age of Seventeen with the Court of Appeals on November 16, 2018. 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.

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.

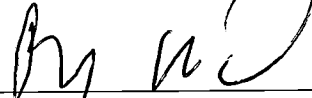
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the Petition for Writ of Certiorari and Appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the Petition for Writ of Certiorari and Appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



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Joanna K. Delany  
Appellate Defender



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Robert M. Dudek  
Chief Appellate Defender

This 21st day of November, 2018.

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IN THE SUPREME COURT

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Appeal from Greenville County  
Letitia H. Verdin, Circuit Court Judge

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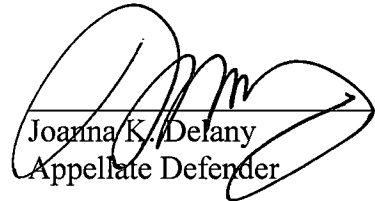
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STATE OF SOUTH CAROLINA,

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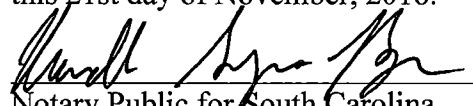
CERTIFICATE OF SERVICE

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, 1000 Assembly Street, Columbia, SC, 29201, this 21st day of November, 2018.

  
Joanna K. Defany  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 21st day of November, 2018.

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