

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to York County  
Janell Gregory, Circuit Court Judge

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NOV 26 2018

S.C. SUPREME COURT

DOMINIQUE J. AGURS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2018-001001

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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 Dominique J. Agurs respectfully requests a **final thirty day extension, until December 26, 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 filed with the Court today. The Court has granted counsel two previous extensions.
2. Counsel for Dominique J. Agurs 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.

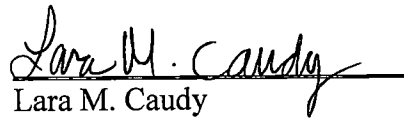
3. Today, November 26, 2018, counsel will file the petition for writ of certiorari and accompanying appendix in Leon Simmons v. The State with the Supreme Court. On November 16, 2018, counsel filed the petition for writ of certiorari and accompany appendix in Gene Tony Cooper v. The State with the Supreme Court. On November 2, 2018, counsel filed the brief of petitioner in Timothy Allen Lemacks v. The State with the Court of Appeals. On October 31, 2018, counsel filed the Anders brief of appellant and record on appeal in The State v. Tony Nevail Myers with the Court of Appeals. On October 9, 2018, counsel had an oral argument in The State v. Felix Kotowski before the Court of Appeals. On October 4, 2018, counsel filed the initial brief of appellant and designation of Matter in The State v. Colette Adriane Collins with the Court of Appeals. On October 1, 2018, counsel testified by telephone in the post-conviction relief case of Jonathan Brown v. The State before the circuit court. From September 24, 2018 through September 26, 2018, counsel attended the annual Public Defender Conference in Myrtle Beach. On September 21, 2018, counsel filed the initial brief of appellant and designation of matter in The State v. Theodore Glover with the Court of Appeals. On September 17, 2018, counsel filed the petition for writ of certiorari and accompanying appendix in Jerell Jackson v. The State with the Supreme Court. On August 30, 2018, counsel filed the petition for writ of certiorari and accompanying Appendix in Roderick Germaine Wynn v. The State with the Supreme Court. On August 24, 2018, counsel filed the petition for writ of certiorari and accompanying appendix in Nehemiah J. Evans v. The State with the Supreme Court.

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

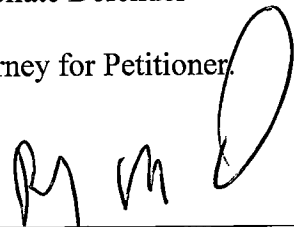
5. Counsel for the Attorney General's office consents to this request as shown by signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until December 26, 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.

Respectfully submitted,

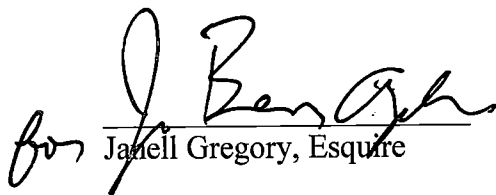
  
Lara M. Caudy  
Appellate Defender

Attorney for Petitioner.

  
Robert M. Dudek  
Chief Appellate Defender

This 26th day of November, 2018.

I consent:

  
Janell Gregory, Esquire