

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Dorchester County  
Kristi Lea Harrington, Circuit Court Judge

---

**ORIGINAL**

FREDRICK B. MOSLEY, JR.

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

**RECEIVED**  
DEC 20 2018  
S.C. SUPREME COURT

APPELLATE CASE NO. 2018-0001113

---

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

---

Counsel for Fredrick B. Mosley respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and accompanying 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 accompanying appendix are due to be served and filed with the Court today.
2. Counsel for Fredrick B. Mosley 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.

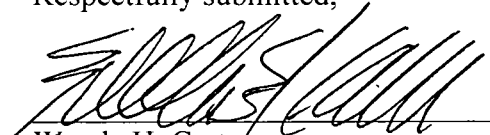
3. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Justin Andrew Serva in the Court of Appeals on December 17, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Cameren L. Kelley v. State in the Supreme Court on December 10, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joseph Christopher Walker v. State in the Supreme Court on December 10, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Henry Antonio Burgess v. State in the Supreme Court on December 5, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny Ray Wilkins v. State in the Supreme Court on December 5, 2018. Counsel had an oral argument in the case of State v. Rhajon Sanders in the Court of Appeals on December 3, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brandon Schmaus v. State in the Supreme Court on November 29, 2018. Counsel attended the reconstruction hearing in the case of Christopher Hampton v. State held in York County on November 26, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of David W. Chiles, Jr. v. State in the Supreme Court on November 19, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jamaad Dreqwan Thomas v. State in the Supreme Court on November 19, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Benjamin Proffitt, Jr. v. State in the Supreme Court on November 14, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Craig Austin Livingston v. State in the Supreme Court on November 14, 2018. Counsel filed the petition for rehearing in the case of State v. Corey Andrew Brown in the Court of Appeals on November 8, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Johnny

Tamar Brown v. State in the Supreme Court on October 31, 2018. Counsel filed the brief of appellant pursuant to White v. State in the case of Johnny Tamar Brown v. State in the Supreme Court on October 31, 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.

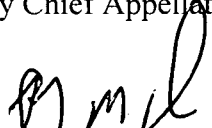
WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, in which to file the petition for writ of certiorari and accompanying appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending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

Respectfully submitted,



---

Wanda H. Carter  
Deputy Chief Appellate Defender



---

Robert M. Dudek  
Chief Appellate Defender

This 20<sup>th</sup> day of December, 2018.

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

RECEIVED

DEC 20 2018

Certiorari to Dorchester County  
Kristi Lea Harrington, Circuit Court Judge

S.C. SUPREME COURT

FREDRICK B. MOSLEY, JR.

PETITIONER

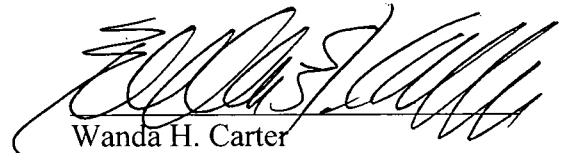
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

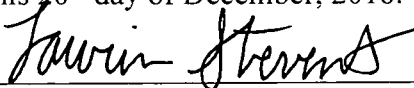
I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Megan Harrigan Jameson, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 20th day of December, 2018.



Wanda H. Carter  
Deputy Chief Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 20<sup>th</sup> day of December, 2018.

 (L.S.)

Notary Public for South Carolina  
My Commission Expires: July 5, 2027.