

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
Robin B. Stilwell, Circuit Court Judge

JAMES BROWN, JR.

v.

STATE OF SOUTH CAROLINA,

PETITIONER
RECEIVED
JAN 04 2019
S.C. SUPREME COURT
RESPONDENT

APPELLATE CASE NO. 2018-001340

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

Counsel for James Brown, Jr., 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:

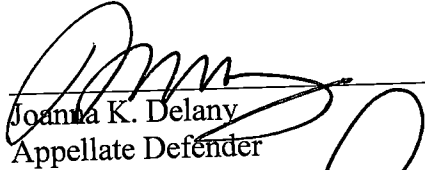
1. The Petition for Writ of Certiorari and Appendix are due to be served and filed with the Court today.
2. Counsel for James Brown, Jr., respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

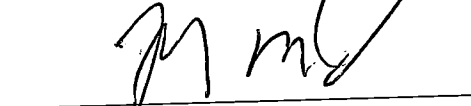
3. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of William Richard Greene v. The State with this Court on January 3, 2019. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Doni Terrelle Anderson v. The State with this Court on December 28, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of James L. Moore v. The State with this Court on December 13, 2018. 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 28, 2018. Counsel filed the petition for writ of certiorari with the accompanying appendix in the case of Joshua A. Reed v. The State with this Court on November 26, 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.

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 4th day of January, 2019.

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Spartanburg County
Robin B. Stilwell, Circuit Court Judge

JAMES BROWN, JR.

PETITIONER

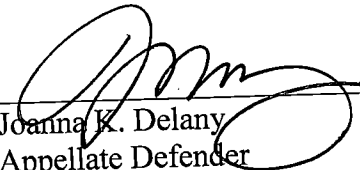
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

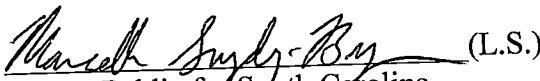
CERTIFICATE OF SERVICE

I certify that a copy of the Motion for an Extension of Time in which to file the Petition for Writ of Certiorari and Appendix in the above referenced case has been served upon Jordan Cox, Esquire, at the Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, S.C. 29201, this 4th day of January, 2019.


Joanna K. Delany
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 4th day of January, 2019.

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