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JAN 14 2019

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Charleston County

Honorable Maite Murphy, Circuit Court Judge  
\_\_\_\_\_

DALE GOULD,

RESPONDENT,

V.

STATE OF SOUTH CAROLINA,

PETITIONER

APPELLATE CASE NO. 2018-000876  
\_\_\_\_\_

PETITION FOR EXTENSION TO FILE  
RETURN TO PETITION FOR WRIT OF CERTIORARI  
\_\_\_\_\_

The undersigned counsel respectfully requests a **final thirty (30) day extension, until February 13, 2019**, in which to file the return to petition for writ of certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The return to petition for writ of certiorari in this case is due to be served and filed today. The Court has granted counsel two previous extensions.
2. Counsel for Dale Gould 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 extensions will be required.

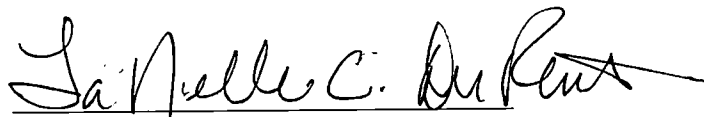
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Michael A. Richardson v. State in the Supreme Court on January 9, 2019. Counsel filed the brief of appellant pursuant to White v. State in the case of Michael A. Richardson v. State in the Supreme Court on January 9, 2019. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Wilbert Franklin Jr. v. State in the Supreme Court on December 19, 2018. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Tyrone Deangelo Fleming in the Court of Appeals on December 5, 2018. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Kairon Brenton Maldonado v. State in the Supreme Court on December 5, 2018. Counsel was a guest speaker at the Appellate Practice Project: Presenting Cases to the Appellate Courts seminar on November 30, 2018. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Ashley Hammitt in the Court of Appeals on November 26, 2018. Counsel filed the Johnson petition for writ of certiorari and accompanying appendix in the case of Thomas Tiedemann v. State in the Supreme Court on November 26, 2018. Counsel filed the Anders brief of appellant and designation of matter in the case of State v. Carlon Eugene Weathers, Jr. in the Court of Appeals on November 20, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of James Allen Johnson v. State in the Supreme Court on November 20, 2018. Counsel filed the brief of appellant pursuant to White v. State in the case of State v. Harry James Roller in the Supreme Court on November 14, 2018. Counsel filed the petition for writ of certiorari, accompanying appendix and supplemental appendix in the case of Harry Roller James v. State in the Supreme Court on November 14, 2018.

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

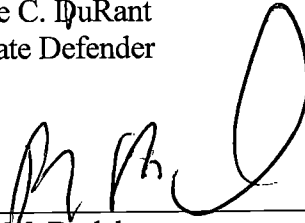
5. Counsel for the Attorney General's office consents to this request as shown by the signature below.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until February 13, 2019**, in which to file the return to petition for writ of certiorari 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,



LaNelle C. DuRant  
Appellate Defender



Robert M. Dudek  
Chief Appellate Defender

January 14, 2019

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Charleston County

Honorable Maite Murphy, Circuit Court Judge  
\_\_\_\_\_

DALE GOULD,

RESPONDENT,

V.

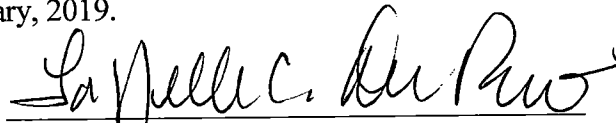
STATE OF SOUTH CAROLINA,

PETITIONER

APPELLATE CASE NO. 2018-000876  
\_\_\_\_\_

CERTIFICATE OF SERVICE  
\_\_\_\_\_

The undersigned attorney hereby certifies that a true copy of the petition for extension to file return to petition for writ of certiorari in the above referenced case has been served upon Megan H. Jameson, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 14th day of January, 2019.



LaNelle C. DuRant  
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me  
this 14<sup>th</sup> day of January, 2019.



(L.S.)

Notary Public for South Carolina  
My Commission Expires: September 27, 2028.