

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County

Honorable Grace Gilchrist Knie, Circuit Court Judge

DEANDRE TYSHUN FOSTER,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2018-001560

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

Counsel for DeAndre Tyshun Foster respectfully requests a **final thirty (30) day extension, until March 1, 2019**, 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 DeAndre Tyshun Foster respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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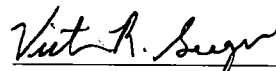
number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Gary Hamilton v. The State with this Court on January 28, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Darnell Khan v. The State with this Court on January 14, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Timothy L. Townsend v. The State with this Court on January 14, 2019. Counsel had oral argument before this Court in the case of The State v. Stephon Robinson on January 10, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Julia Shawnette Gorman v. The State with this Court on January 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Tyrone Davis v. The State with this Court on January 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Alexander Maldonado Coreano v. The State with this Court on December 17, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Billy L. Alford v. The State with this Court on December 17, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Orin Jerrell Kemp with the Court of Appeals on December 7, 2018. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Richard Lanard Sprinkle Mavins v. The State with this Court on December 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Sean L. Stroman with the Court of Appeals on November 26, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Joseph Goodrich with the Court of Appeals on November 21, 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 signature below.

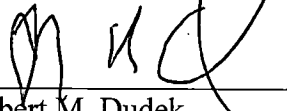
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 1, 2019**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Victor R. Seeget
Appellate Defender

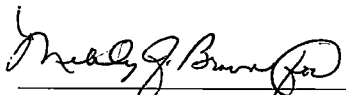
Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 30th day of January, 2019.

I consent:



Johnny James, Jr., Esquire