

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to Florence County

Paul M. Burch, Circuit Court Judge

RECEIVED
FEB 06 2019
S.C. SUPREME COURT

CHARLES BERLIN PENNELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001301

PETITION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI
AND ACCOMPANYING APPENDIX

The undersigned counsel respectfully requests a thirty-day extension, **until March 8, 2019**, in which to file the petition for writ of certiorari and accompanying appendix in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

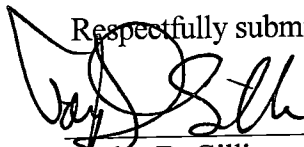
1. The petition for writ of certiorari and accompanying appendix in this case are due to be served and filed today.
2. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Allen Bobo with the Court of Appeals on February 6, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Lapis Flowers with the

Court of Appeals on February 1, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Green v. State with the Supreme Court on January 28, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Demossio Valentine v. State with the Supreme Court on January 18, 2019. Counsel filed the brief of petitioner in the case of Eric Spratt v. The State on January 9, 2019 with the Court of Appeals. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Joseph Chappell with the Court of Appeals on January 7, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Lavonte Fabor v. State in the Supreme Court on December 28, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Christopher Cobb v. State with the Supreme Court on December 21, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. John Hart with the Court of Appeals on December 17, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Cliston Bellamy v. State with the Supreme Court on December 12, 2018.

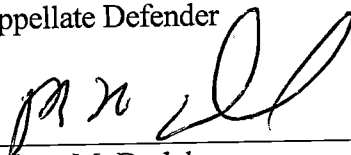
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension. Counsel respectfully requests that the time limits for filing the petition for writ of certiorari and accompanying appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

February 6, 2019

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Florence County

Paul M. Birch, Circuit Court Judge

CHARLES BERLIN PENNELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

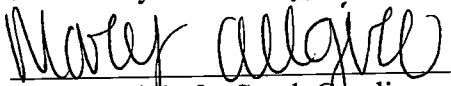
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Lindsey McCallister, Esquire, Office of the Attorney General, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 6th day of February, 2019.



Taylor D. Gilliam
Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 6th day of February, 2019.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: May 12, 2027.