

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

ORIGINAL

Certiorari to York County

Honorable William A. McKinnon, Circuit Court Judge

BRETT THOMAS CURTISS,

RECEIVED

FEB 19 2019

PETITIONER,

S.C. SUPREME COURT

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2018-001767

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

Counsel for Brett Thomas Curtiss 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:

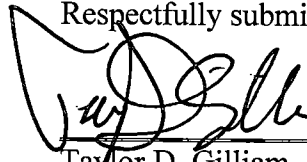
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Brett Thomas Curtiss respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously 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 and accompanying appendix in the case of David Stephens v. State with this Court on February 19, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Jonathan Hellams with the Court of Appeals on February 13, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Ashley McKenzie with the Court of Appeals on February 11, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Terrell Freeman 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. Lapris 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 this 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 this 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 this Court on December 28, 2018. Counsel filed the petition for writ of certiorari and appendix in the case of Christopher Cobb v. State with this 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.

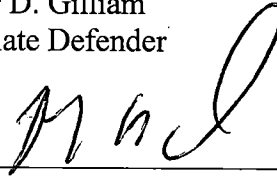
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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 be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Taylor D. Gilliam
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

February 19, 2019

Attorney for Petitioner

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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CERTIFICATE OF SERVICE

I certify that a true copy of the motion for an extension of time in which to file the petition for writ of certiorari and appendix in the above case has been served upon Janell Gregory, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 19th day of February, 2019.



Taylor D. Gilliam
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 19th day
of February, 2019.

Marcy Allgire (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12, 2027.