

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Florence County
Paul M. Burch, Circuit Court Judge

ORIGINAL

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MAR 08 2019

CHARLES BERLIN PENNELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001301

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

Counsel respectfully requests a **final extension of thirty (30) days until April 8, 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 is due to be served and filed with the Court today.
2. Counsel 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 his caseload, counsel hopes that no further extension requests will be required.

3. Counsel will file the petition for writ of certiorari and accompanying appendix in the case of Allen Bobo v. State with this Court today, March 8, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Lawrence Kelley with the Court of Appeals on March 4, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals in the case of Dajlia Torbitt v. State with this Court on March 1, 2019. 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.

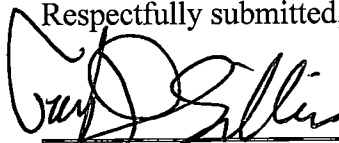
4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload

will hopefully become more manageable in the near future, and less extensions will need to be requested.

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

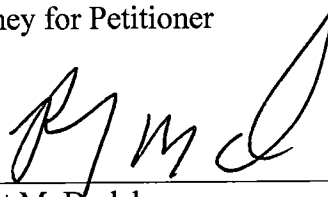
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension until April 8, 2019**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances.

Respectfully submitted,



Taylor Gilliam
Appellate Defender

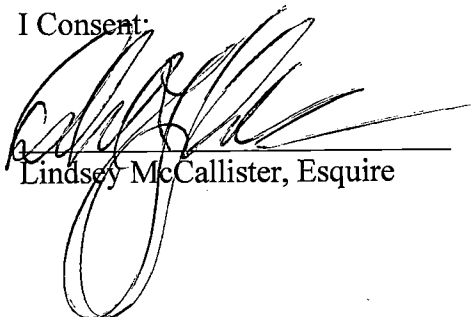
Attorney for Petitioner



Robert M. Dudek
Chief Appellate Defender

This 8th day of March, 2019

I Consent:



Lindsey McCallister, Esquire