

ORIGINAL

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

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

Honorable Roger M. Young, Circuit Court Judge  
\_\_\_\_\_

RECEIVED

APR 26 2010

S.C. SUPREME COURT

MARVIN BOWENS-GREEN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA

RESPONDENT

APPELLATE CASE NO. 2018-001755  
\_\_\_\_\_

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

Counsel for Marvin Bowens-Green 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:

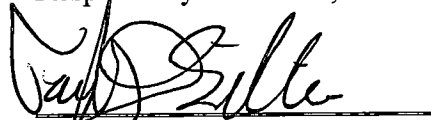
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Marvin Bowens-Green respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously 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 Beneco Ganson v. The State with the Supreme Court on April 22, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Brett Curtiss v. The State with the Supreme Court on April 22, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Charles Pennell v. The State with the Supreme Court on April 10, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ricky Passmore v. The State with the Supreme Court on April 1, 2019. Counsel filed the brief of petitioner in the case of The State v. Samuel Alexander with the Supreme Court on March 25, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix and the brief of appellant pursuant to White v. State in the case of James Wilson v. State with the Supreme Court on March 15, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Allen Bobo v. State with the Supreme Court on 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 the Supreme Court on March 1, 2019.

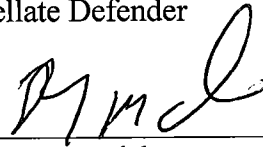
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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

Attorney for Petitioner

April 26, 2019

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

\_\_\_\_\_  
Certiorari to Charleston County  
Honorable Roger M. Young, Circuit Court Judge  
\_\_\_\_\_

MARVIN BOWENS-GREEN,

PETITIONER,

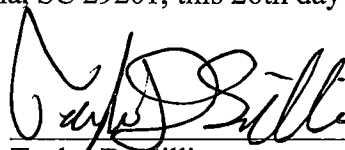
V.

STATE OF SOUTH CAROLINA

RESPONDENT

\_\_\_\_\_  
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 Benjamin Limbaugh, Esquire, Assistant Attorney General, Office of the Attorney General, Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 26th day of April, 2019.



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Taylor D. Gilliam  
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 26th day  
of April, 2019.

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