

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Greenville County

Letitia H. Verdin, Circuit Court Judge

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APR 29 2019

S.C. SUPREME COURT

KARACUS K. FREEMAN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001958

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

The undersigned counsel respectfully requests a thirty day extension 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. Ricky Anthony Short with the Court of Appeals on April 26, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Randall Clark

with the Court of Appeals on April 16, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Rickey Wilson with the Court of Appeals on April 10, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Samuel Gonzalez with the Court of Appeals on April 8, 2019. Counsel had an oral argument in the case of The State v. Robert I. Graham before the Court of Appeals on April 2, 2019. Counsel had an oral argument in the case of The State v. Cory Nettles Allen before the Court of Appeals on April 1, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Antwon Baker v. The State with this Court on March 26, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Aneisha Young with the Court of Appeals on March 22, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Reginald Hamilton with the Court of Appeals on March 4, 2019. Counsel had an oral argument in the case of The State v. Tekysha Cohen before the Court of Appeals on March 4, 2019. Counsel presented at the “Year End” CLE in Greenville, South Carolina on February 8, 2019. **Counsel has extensive administrative duties as the Chief Appellate Defender, including administrative and Appellate Project oversight, and training four less experienced appellate defenders and reviewing all their filings in advance.**

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,

A handwritten signature in black ink, appearing to read 'R. M. Dudek', written over a horizontal line.

Robert M. Dudek
Chief Appellate Defender

April 29, 2019

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Greenville County
Letitia H. Verdin, Circuit Court Judge

KARACUS K. FREEMAN,

PETITIONER,

V.

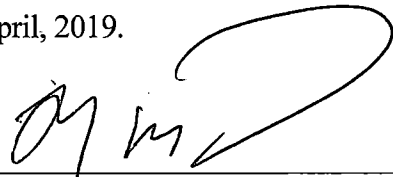
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2018-001958

CERTIFICATE OF SERVICE

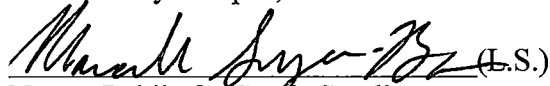
The undersigned attorney hereby certifies that a true copy of the petition for extension to file petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Taylor Z. Smith, Esquire, at Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 29th day of April, 2019.



Robert M. Dudek
Chief Appellate Defender

ATTORNEY FOR PETITIONER.

SUBSCRIBED AND SWORN TO before me
this 29th day of April, 2019.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: July 26, 2028.