

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Richland County  
D. Craig Brown, Circuit Court Judge

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NATHANIEL MITCHELL,

ORIGINAL  
RECEIVED  
MAY 01 2019  
S.C. SUPREME COURT  
PETITIONER

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-000069

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

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Counsel for Nathaniel Mitchell respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and accompanying 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:

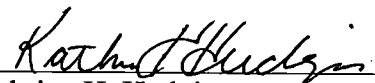
1. The petition for writ of certiorari and accompanying appendix are due to be served and filed with the Court today.
2. Counsel for Nathaniel Mitchell respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

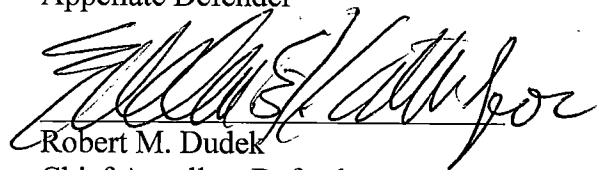
3. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Mitchell Logan Hinson v. The State of South Carolina with the Supreme Court on April 26, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Joey Clark v. The State of South Carolina with the Supreme Court on April 24, 2019. Counsel filed the Anders brief of appellant and designation of matter in the case of The State of South Carolina v. Jimmy Byron Keith Curles with the Court of Appeals on April 16, 2019. Counsel filed the return to petition for writ of certiorari in the case of The State of South Carolina v. Marshall Hill with the Supreme Court on April 9, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Levance Dunham with the Court of Appeals on April 5, 2019. Counsel filed the brief of petitioner in the case of The State of South Carolina v. Maurice A. Odom with the Supreme Court on April 3, 2019. Counsel filed the petition for writ of certiorari to the Court of Appeals and accompanying appendix in the case of The State of South Carolina v. James Bubba Patterson with the Supreme Court on March 21, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. Jane Katherine Hughes with the Court of Appeals on March 21, 2019. Counsel had an oral argument in the case of The State of South Carolina v. Dean Alton Holcomb before the Court of Appeals on March 14, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Adonis Williams v. The State of South Carolina with the Supreme Court on March 11, 2019. Counsel filed the brief of appellant pursuant to White v. State in the case of Adonis Williams v. The State of South Carolina with the Supreme Court on March 11, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State of South Carolina v. William Tiay Chandler with the Court of Appeals on March 5, 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 accompanying 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,

  
Kathrine H. Hudgins  
Appellate Defender

  
Robert M. Dudek  
Chief Appellate Defender

This 1<sup>st</sup> day of May, 2019.

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Richland County  
D. Craig Brown, Circuit Court Judge

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NATHANIEL MITCHELL,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

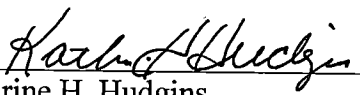
RESPONDENT

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CERTIFICATE OF SERVICE

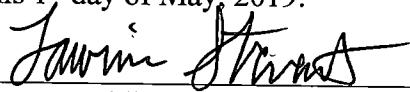
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I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and accompanying appendix in the above referenced case has been served upon Lindsey McCallister, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 1st day of May, 2019.

  
Kathrine H. Hudgins  
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me  
this 1<sup>st</sup> day of May, 2019.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: July 5, 2027.