

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Charleston County
Eugene C. Griffith, Circuit Court Judge

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MAY 29 2019
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S.C. SUPREME COURT
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JONTA GREEN,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2019-000329

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

Counsel for Jonta 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:

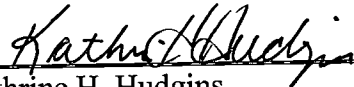
1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.
2. Counsel for Jonta Green respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted 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 return to petition for writ of certiorari in the case of McIver R. Feagin, Jr. v. The State of South Carolina with the Supreme Court on May 17, 2019. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ryan P. Deleston v. The State of South Carolina with the Supreme Court on May 13, 2019. Counsel filed the petition for rehearing in the case of State v. Dean Alton Holcomb with the Court of Appeals on May 2, 2019. 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. Marshell 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.

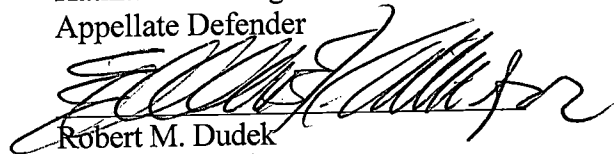
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Attorney General's office has been informed of this request.

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,



Kathrine H. Hudgins
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

Attorney for Petitioner

May 29, 2019

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JONTA GREEN,

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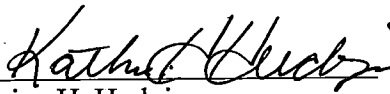
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RESPONDENT

APPELLATE CASE NO. 2019-000329

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 29th day of May, 2019.



Kathrine H. Hudgins
Appellate Defender

ATTORNEY FOR PETITIONER

SWORN TO BEFORE ME this 29th day
of May, 2019.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: May 12, 2027