

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

ORIGINAL
RECEIVED

MAY 29 2019

KARACUS K. FREEMAN,

S.C. SUPREME COURT
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 **final thirty day extension, until June 28, 2019**, 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 is attending the trial today, Wednesday, May 29, 2019, in State v. Timothy Jones, Jr., in Lexington serving in the role of appellate advisor to the Capital Trial Unit and the Chief Circuit Public Defender. Counsel has also been at the some of the voir dire proceedings in

that trial on previous occasions, and will continue to serve in that capacity as appellate advisor at least one day a week until the trial is completed. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Casey Dajuan Geter with the Court of Appeals on May 21, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. David Matthew Carter with the Court of Appeals on May 14, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Brandon Childers with the Court of Appeals on May 3, 2019. 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 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. As indicated by his consent below, counsel for the state does not oppose this request.

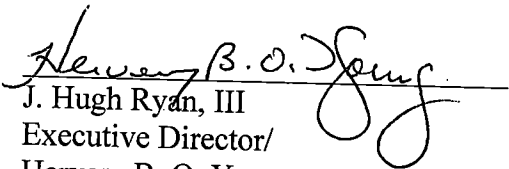
4. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

WHEREFORE, the undersigned counsel would respectfully request a **final thirty day extension, until June 28, 2019**, in which to file the petition for writ of certiorari and accompanying appendix. 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,



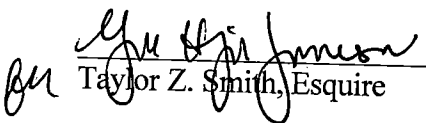
Robert M. Dudek
Chief Appellate Defender



J. Hugh Ryan, III
Executive Director/
Hervery B. O. Young
Deputy Director and General Counsel/
W. Lawrence Brown
Deputy General Counsel and Training
Director

This 28th day of May, 2019

I do not oppose:



Taylor Z. Smith, Esquire